California Fish and Game Commission

Meeting Binder

Volume 3

Agenda Items 9-14

May 5-6, 2026

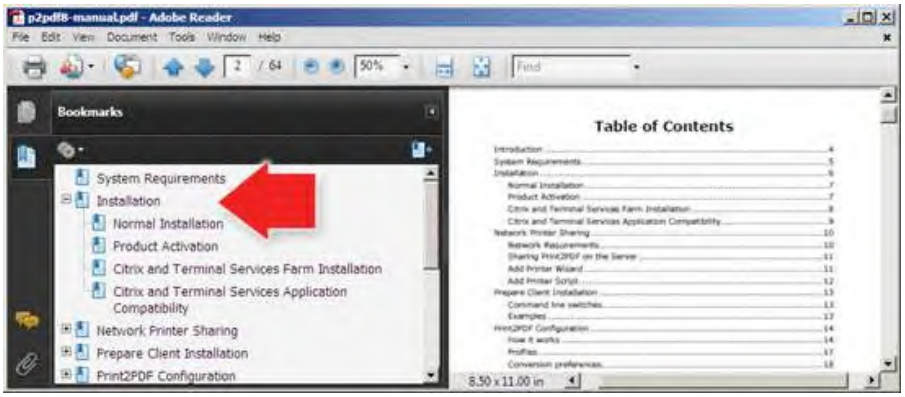
Goleta

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.

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.

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:

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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www.fgc.ca.gov

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

Staff Summary for May 5-6, 2026

9. Central Valley Sport Fishing

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

Consider adopting proposed amendments to Central Valley sport fishing regulations and taking final action under the California Environmental Quality Act.

Summary of Previous/Future Actions

- Wildlife Resources Committee vetting — September 11, 2025; WRC
- Notice hearing — February 11-12, 2026
- Discussion hearing — April 15-16, 2026
- **Today's adoption hearing** — **May 6, 2026**

Background

At its February 2026 meeting, the Commission authorized publication of notice of its intent to amend sport fishing regulations on the American, Feather, Mokelumne and Sacramento rivers (collectively referred to as Central Valley rivers). The notice appeared in the California Regulatory Notice Register on March 20, 2026. Further background on the regulatory options noticed by the Commission can be found in the February 2026 staff summary (Exhibit 1) and the initial statement of reasons (Exhibit 2).

As part of the annual process, specific bag, possession, and size limits for Sacramento River fall-run Chinook salmon (SRFC) are scheduled for adoption by the Commission after the Pacific Fishery Management Council (PFMC) reviews the status of West Coast salmon stocks and recommends fishery allocations. Having completed the report *Stock Abundance Analysis and Environmental Assessment for 2026 Ocean Salmon Fishery Regulations* in March 2025 (Exhibit 6), the PFMC recommended during its April 7-12, 2026 meeting final management measures for the upcoming ocean salmon season.

At the Commission's April 2026 meeting, the Department provided an update on the results of the PFMC process and recommended that the Commission open the Central Valley Chinook salmon fishery, with a universal two-fish bag limit and four-fish possession limit and some variation in open season dates (Exhibit 9).

Today, the Commission is scheduled to determine whether to adopt the noticed regulatory amendments and, if so, to select one of the options within the noticed ranges.

California Environmental Quality Act (CEQA)

The Department drafted an initial study and negative declaration as a proposed mechanism for complying with CEQA and provided the draft to the Commission. Commission staff has reviewed and analyzed the negative declaration and determined that it reflects the independent judgment of the Commission. The Commission submitted the draft negative declaration for publication to allow for review by other agencies and public comment (State Clearinghouse #2026040456, available at ceqanet.opr.ca.gov/2026040456); no public comments were received.

Significant Public Comments (N/A)

Recommendation

Commission staff: Find that the negative declaration reflects the independent judgment of the Commission, adopt the declaration, approve the proposed project for purposes of CEQA, and adopt Option 1 as described in the initial statement of reasons, with season dates and bag and possession limits as recommended by the Department.

Department: Adopt the regulatory language under Option 1 as proposed, with season dates and bag and possession limits as detailed in the Department's presentation.

Exhibits

1. Staff summary from February 11-12, 2026 Commission meeting, Agenda Item (for background purposes only)
2. Initial statement of reasons
3. Noticed regulatory language
4. Economic and fiscal impact statement (STD. 399)
5. Department memo transmitting pre-adoption statement of reasons, received April 30, 2026
6. Pre-adoption statement of reasons
7. Link to online PFMC report: Stock Abundance Analysis and Environmental Assessment Part 1 for 2026 Ocean Salmon Fishery Regulations, dated March 2026
8. Department memo transmitting draft negative declaration, received March 16, 2026
9. Draft negative declaration regarding Central Valley Sport Fishing Regulations (State Clearinghouse #2026040456
10. Department presentation, including recommendation

Motion

Moved by _____ and seconded by _____ that the Commission finds that the negative declaration reflects the independent judgment of the Commission, adopts the declaration, approves the proposed project pursuant to the California Environmental Quality Act, and adopts Option 1 of the proposed amendments to subsections 7.40(b)(4), (43), (66) and (80) related to Central Valley sport fishing regulations for the 2026 season, with new season dates, size limits, and bag and possession limits as discussed today.

Staff Summary for May 5-6, 2026

10. Klamath River Basin Sport Fishing

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

Consider adopting proposed amendments to Klamath River Basin sport fishing regulations and taking final action under the California Environmental Quality Act.

Summary of Previous/Future Actions

- Wildlife Resources Committee vetting — September 11, 2025; WRC
- Notice hearing — February 11-12, 2026
- Discussion hearing — April 15-16, 2026
- **Today's adoption hearing** — **May 6, 2026**

Background

At its February 2026 meeting, the Commission authorized publication of notice of its intent to amend sport fishing regulations on the Klamath and Trinity rivers (referred to as the Klamath River Basin). The notice appeared in the California Regulatory Notice Register on March 20, 2026. Further background on the regulatory options noticed by the Commission can be found in theFebruary 2026 staff summary (Exhibit 1) and the initial statement of reasons (Exhibit 2).

As part of the annual regulatory process, specific bag, possession and size limits for Klamath River fall-run Chinook salmon are scheduled for adoption by the Commission after the Pacific Fishery Management Council (PFMC) reviews the status of West Coast salmon stocks and recommends fishery allocations. Having completed the report *Stock Abundance Analysis and Environmental Assessment for 2026 Ocean Salmon Fishery Regulations* in March 2026 (Exhibit 6), PFMC recommended its final management measures for the upcoming ocean salmon season at its April 7-12, 2026 meeting.

At the Commission's April 2026 meeting, the Department recommended opening both the Klamath River Basin fall and spring Chinook salmon fisheries based on the recommended PFMC management measures for ocean salmon (Exhibit 9). At today's meeting, the Commission is scheduled to determine whether to adopt the noticed amendments and, if so, select the season dates and an option within the noticed ranges for quota, size, bag and possession limits (under Option 1), or a fishery closure (Option 2), based on PFMC's final recommendation.

California Environmental Quality Act (CEQA)

The Department prepared a draft addendum (exhibits 8 and 9) to the 2025 negative declaration (State Clearinghouse No. 2025040692) regarding Klamath River Basin sport fishing regulations; the Commission adopted the negative declaration in May 2025.

Commission staff evaluated the addendum and determined that it reflects the independent judgment of the Commission. The addendum is intended to inform Commission consideration of proposed amendments to daily bag and possession limits for Chinook salmon, as described in the proposed rulemaking. The 2025 negative declaration concluded that there would be no

significant impacts for the range of daily bag and possession limits considered under regulatory options 1 and 2. Since the proposed daily bag and possession limits for 2026 fall within the previously-analyzed range, and the proposed amendments use similar regulatory options, there are no anticipated new, significant, or substantially more severe environmental impacts.

Significant Public Comments

1. The Trinity County Board of Supervisors requests a one-fish daily bag limit on the Trinity River with adaptive safeguards in place, rather than a blanket closure of the river. (Exhibit 11)

Recommendation

Commission staff: Find that the Commission, having considered the addendum and associated environmental document, approves the revised project pursuant to CEQA, and adopts Option 1 of the proposed amendments as recommended by the Department.

Department: Adopt Option 1 of the proposed amendments to Klamath River Basin sport fishing as detailed in the ISOR and the Department's presentation.

Exhibits

1. Staff summary from February 11-12, 2026 Commission meeting, Agenda Item (for background purposes only)
2. Initial statement of reasons
3. Noticed regulatory language
4. Economic and fiscal impact statement (STD. 399)
5. Department memo transmitting pre-adoption statement of reasons
6. Pre-adoption statement of reasons
7. Link to online PFMC report: Stock Abundance Analysis and Environmental Assessment Part 1 for 2026 Ocean Salmon Fishery Regulations, dated March 2026
8. Department memo transmitting draft CEQA addendum, received March 16, 2026
9. Draft addendum to 2025 Final Negative Declaration Regarding Klamath River Basin Sport Fishing Regulations (State Clearinghouse #2025040692)
10. Department presentation, including recommendations
11. Letter from Trinity County Board of Supervisors, received April 17, 2026

Motion

Moved by _____ and seconded by _____ that the Commission, having considered the addendum and associated negative declaration, approves the revised project pursuant to the California Environmental Quality Act, and adopts Option 1 of the proposed amendments to subsection 7.40(b)(50) related to Klamath River Basin sport fishing regulations for the 2026 season and spring fishery with quotas, bag and possession limits, and size limits as discussed today.

Staff Summary for May 5-6, 2026

11. Marine Protected Area (MPA) Petition 2023-18MPA

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

Receive a presentation from the petitioner, followed by public comment and discussion for 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.*

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
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• Received petitioners' presentation 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 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 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 2023-18MPA (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 and Evaluations*.

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. This petition was not amended.

Overview of Actions in Petition 2023-18MPA Relevant to This Region

This petition, submitted by Greg Helms, proposes seven actions that refine the network to address MLPA governance and management pillars aimed at enhanced compliance and enforceability, regulatory clarity, and MPA design guidelines; four of the seven petitioned actions are located in this region (action numbers from the Department's evaluation are included for reference):

Action 5. Eliminate the pinniped Special Closure at San Miguel Island

Action 6. Reduce the size of the brown pelican Anacapa Island Special Closure to allow boat access to Frenchy's Cove

Action 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*"

Stated Intent

The petitioner proposes changes to improve and refine MPAs and/or MPA management "based on Santa Barbara Channel MPA Collaborative Members' on-the-ground/water experience as well as the findings of the 2023 MPA Decadal Management Review. MPA outcomes are closely linked with their core management pillars including research and monitoring; education and outreach; policy and permitting; and enforcement and compliance." See Exhibit 1 for more details.

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 this meeting's comment deadline 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, including for Petition 2023-18MPA (Exhibit 3). The Department also released a companion document, to offer essential context that is intended to be reviewed before the individual petition evaluations.

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 will present Petition 2023-18MPA and describe any proposed changes since the March 2025 amendment deadline, if any. This meeting provides petitioners an opportunity to engage in dialogue with the Commission alongside robust public participation.

All meeting 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. An organization representing commercial fishermen, industry partners, and others dependent upon access to California's coastal resources supports the proposed refinements to MPAs within the Santa Barbara Channel region. The organization finds that the petition represents a collaborative, consensus-based effort that resulted in refinements that achieve improvements for compliance, enforceability, and public understanding of existing MPAs. (Exhibit 4)
2. A recreational angler and diver from northern California urges the Commission deny the petition to maintain the status quo (Exhibit 5).
3. The petitioner provides brief responses to the Department's evaluation of Petition 2023-18MPA. They appreciate the opportunity for Frenchy's Cove landing access via special permit would largely address their intent for this action in the petition, but they assert that local users indicate a boundary alteration would be clearer and thus preferable. (Exhibit 6)

Recommendation

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

Department: Deny the petition actions, for the reasons detailed in Exhibit 3. In summary,

- The proposal to abolish the San Miguel Island and Anacapa Island Special Closures and to reduce the size of the California brown pelican fledgling area within the Anacapa Island Special Closure does not address a current MPA management challenge and would conflict with the original intent of these protections.
- These areas were established prior to MPA implementation in the northern Channel Islands to safeguard highly sensitive seabird and pinniped populations.
- Given ongoing sensitivity of these animals to human disturbance and natural population fluctuations, there is a continued need for these special closures.

Exhibits

1. Petition 2023-18MPA, received November 28, 2023
2. Packet of comments, received November 2023 through April 17, 2026
3. Department evaluation of Petition 2023-18MPA, received March 20, 2026
4. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026

5. Email from Rick Duenas, received April 22, 2026
6. Letter from Greg Helms, received April 22, 2026

Motion (N/A)

Staff Summary for May 5-6, 2026

12. Marine Protected Area (MPA) Petition 2023-27MPA_AM1

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

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-27MPA_AM1: *Request to modify Anacapa Island State Marine Conservation Area (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.*

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
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• Received petitioners' presentation 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 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 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 2023-27MPA, 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 and Evaluations*.

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. This petition was formally amended (AM1) by the March 2025 deadline (Exhibit 1; 2023-27MPA_AM1). The amendment removed a request to reclassify the Anacapa Island SMCA into an SMR and, instead, provided alternative options for achieving the goals of the petition while being responsive to community outreach.

Overview of Actions in Petition 2023-27MPA_AM1 Relevant to This Region

This petition, submitted by Environmental Defense Center, proposes to amend Anacapa Island SMCA or Anacapa Island Special Closure with one of three options to best protect eelgrass (*Zostera spp*.) meadows while allowing for community access (as amended); there is only one proposed action and it is located in this region:

Action 1. Amend the existing Anacapa Island SMCA (which currently allows recreational take of spiny lobster and pelagic finfish, commercial take of spiny lobster, and a tribal exemption for the Santa Ynez Band of Chumash Indians) or amend the Anacapa Island Special Closure (which currently disallows using nets or traps in waters less than 20 feet deep off the Anacapa Islands and has a seasonal brown pelican fledgling closure), evaluating three options (solutions) and choose the one that best protects the eelgrass meadow while allowing for community access:

Option 1: Change Anacapa Island SMCA regulations to disallow commercial California spiny lobster (*Panulirus interruptus*) fishing year-round.

Option 2: Change Anacapa Island SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows.

Option 3: 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 0-20 feet (0-6.1 meters) deep off Anacapa Island.

Stated Intent

The petitioner explains that the proposed change is motivated by findings of a study at the island that suggests lobster trapping and anchoring cause damage to eelgrass meadows. They maintain that their petition supports the goals of the Marine Life Protection Act (MLPA), aligns with state and federal policies focused on eelgrass resilience and health, and protects important eelgrass and associated marine life at Anacapa Island. See Exhibit 1 for more details.

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 this meeting's comment deadline 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, including for Petition 2023-27MPA_AM1 (Exhibit 3). The Department also released a companion document, to offer essential context that is intended to be reviewed before the individual petition evaluations.

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 will present Petition 2023-27MPA_AM1 as amended in January 2025 and describe any proposed changes since the March 2025 amendment deadline. This meeting provides petitioners an opportunity to engage in dialogue with the Commission alongside robust public participation.

All meeting 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. An organization representing commercial fishermen, industry partners, and others dependent upon access to California's coastal resources opposes the proposed changes to Anacapa Island SMCA. The group raises concerns about fishing effort changes that would result from the proposed changes, including an increased pressure on allowable fishing grounds. The organization urges the Commission to deny the petition or require socioeconomic, effort displacement, cumulative impact, and economic impact analyses before proceeding. (Exhibit 4)
2. A recreational angler and diver from northern California who frequents Anacapa finds the petition to be reasonable and targeted but, ultimately, supports the Department's recommendation to deny the petition. (Exhibit 5)

Recommendation

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

Department: Deny the petition, including all three options, for the reasons detailed in Exhibit 3. In summary:

- Although there has been a decline and lack of eelgrass recovery at Frenchy's Cove, there is no indication that the primary driver of the decline or lack of recovery of eelgrass in Frenchy's Cove is bottom contact fishing gear and anchoring that may occur

during the two-month window when fishing is allowed in the brown pelican (*Pelecanus occidentalis*) fledgling area.

- The proposed options are unlikely to have a biologically meaningful impact on eelgrass at this location beyond what is already offered by the Anacapa Island SMCA and Special Closure and brown pelican fledgling area, and it would unnecessarily restrict an important fishing ground that was carefully contemplated and deliberated during the Northern Channel Islands MPA planning and implementation process.

Exhibits

1. Petition 2023-27MPA_AM1, received November 30, 2023 and amended January 7, 2025.
2. Packet of comments, received November 2023 through April 17, 2026
3. Department evaluation of Petition 2023-27MPA, received March 20, 2026
4. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
5. Email from Rick Duenas, received April 22, 2026

Motion (N/A)

Staff Summary for May 5-6, 2026

13. Marine Protected Area (MPA) Petition 2023-14MPA

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

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-14MPA: *Request to allow commercial take of red sea urchins in Naples State Marine Conservation Area (SMCA) and Anacapa Island 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
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• Received petitioners' presentation 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 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 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 2023-14MPA (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 and Evaluations*.

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. This petition was not amended.

Overview of Actions in Petition 2023-14MPA Relevant to This Region

This petition, submitted by the California Sea Urchin Commission, proposes to modify take regulations at nine SMCAs to allow the commercial take of sea urchin; two of the nine SMCAs are located in this region (action numbers from the Department's evaluation are included for reference):

Action 5. Add commercial take of sea urchin at Naples SMCA, where current regulations allow recreational spearfishing of white seabass and pelagic finfish, commercial take of giant kelp by hand harvest or by mechanical harvest, and include a tribal take exemption for Santa Ynez Band of Chumash Indians (SYBCI)

Action 6. Add commercial take of sea urchin at Anacapa Island SMCA, where current regulations allow recreational take of spiny lobster and pelagic finfish, commercial take of spiny lobster, and include a tribal take exemption for SYBCI.

Stated Intent

The petitioner explains that the proposed change is motivated by "…the marine heat wave that started in 2014, [which] led to large declines in kelp and urchin landings, resulting in [a] federal fishery disaster declaration;" and that "allowing commercial urchin fishing within the listed SMCAs will improve the [economic] sustainability of the urchin industry and may also support kelp recovery efforts." See Exhibit 1 for more details.

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 this meeting's comment deadline 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, including for Petition 2023-14MPA (Exhibit 3). The Department also released a companion document, to offer essential context that is intended to be reviewed before the individual petition evaluations.

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 will present Petition 2023-14MPA and describe any proposed changes since the March 2025 amendment deadline. This meeting provides petitioners an opportunity to engage in dialogue with the Commission alongside robust public participation.

All meeting 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 petitioner provides written comments they were unable to fully share at the Commission's April 15-16, 2026 meeting due to a one-minute time limit. They reiterate that their petition is motivated by a desire to allow the commercial urchin fishery to remove overpopulated urchins in selected MPAs to facilitate kelp restoration. While expressing disappointment that the Department concluded their petition did not meet the standards of the master plan guidelines, they indicated interest in working with the Commission and the Department to develop a well-reasoned approach that could be incorporated into the kelp restoration management plan currently under development. (Exhibit 4)
2. An organization representing commercial fishermen, industry partners, and others dependent upon access to California's coastal resources supports the proposed changes to Anacapa Island SMCA. The organization described the petition as a thoughtful, forward-looking example of adaptive management that addresses ecological challenges and the socioeconomic needs of coastal fishing communities. (Exhibit 5)
3. A recreational angler and diver from northern California urges the Commission to deny the petition, emphasizing the importance of maintaining SMCAs as control treatment sites relative to urchin-barren mitigation occurring outside MPA boundaries (Exhibit 6).

Recommendation

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

Department: Deny all petition actions, for the reasons detailed in Exhibit 3. In summary:

- The proposed change to allow commercial urchin harvest within these SMCAs does not advance adaptive management recommendations from the Decadal Management Review nor address a current or emerging MPA management challenge.
- The change would conflict with the original goals of these MPAs and potentially undermine the long-term MPA monitoring program.
- There is no evidence to support that the proposed change would improve the sustainability of the urchin industry.
- Commercial urchin removal efforts are unlikely to result in meaningful and sustained kelp recovery without a clear understanding of the site-specific drivers of kelp loss.

- Statewide kelp restoration and management efforts should be guided by a kelp restoration and management plan, which is in development.

Exhibits

1. Petition 2023-14MPA, received November 13, 2023
2. Packet of comments, received November 2023 through April 17, 2026
3. Department evaluation of Petition 2023-14MPA, received March 20, 2026
4. Email from David Goldenberg, received April 20, 2026
5. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
6. Email from Rick Duenas, received April 22, 2026

Motion (N/A)

14. Marine Protected Area (MPA) Petition 2023-15MPA_AM2

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

Receive a presentation from the petitioner, followed by public comment and discussion for Petition 2023-15MPA_AM2: *Request to change the classification of Footprint State Marine Reserve (SMR), Santa Barbara Island SMR, and Gull Island SMR to State Marine Conservation Areas (SMCAs) to allow take of pelagic finfish species through one of several options.*

Summary of Previous/Future Actions

• Received 20 MPA petitions; referred to the Marine Resources Committee and the Department for review	December 2023; February 2024
• Granted or denied all individual actions in the 5 "bin 1" MPA petitions	December 2024
• Received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• Received petitioners' presentation 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 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 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 2023-15MPA, 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 and Evaluations*.

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. This petition was formally amended

(AM1 and AM2) by the March 2025 deadline (see Petition 2023-15MPA_AM2 in Exhibit 1). The amendments offered modified take combinations to align with federal essential fish habitat gear restrictions, offer simplified take combinations, remove gear type disallowed in state waters and account for feasibility guidelines. In later correspondence, the petitioner requested that the Department only evaluate the options that would maintain a high level of protection in the MPAs.

Overview of Actions in Petition 2023-15MPA_AM2 Relevant to This Region

This petition, submitted by Blake Hermann, proposes to reclassify three SMRs as SMCAs to allow take of pelagic and/or highly migratory species (HMS); all of the proposed changes are located in this region (action numbers from the Department's evaluation are included for reference):

Action 1. Reclassify Footprint SMR to SMCA to allow either the limited take of HMS and possession of coastal pelagic species, or the take of pelagic finfish via six options. Options include various combinations of methods of take, including hook-and-line, spear, harpoon (swordfish only), and options to prohibit "bottom-contact gear" (see petition for specific options).

Action 2. Reclassify Gull Island SMR to an SMCA (or an inshore SMCA or SMR with an offshore SMCA) to allow either the limited take of HMS and possession of coastal pelagic species, or the take of pelagic finfish via six options. Options include various combinations of methods of take, including hook-and-line, spear, harpoon (swordfish only), and options to prohibit "bottom-contact gear" (see petition for specific options).

Action 3. Reclassify Santa Barbara Island SMR to an SMCA (or an inshore SMCA or SMR with an offshore SMCA) to allow either the limited take of HMS and possession of coastal pelagic species, or the take of pelagic finfish via six options. Options include various combinations of methods of take, including hook-and-line, spear, harpoon (swordfish only), and options to prohibit "bottom-contact gear" (see petition for specific options).

Note that the petitioner also submitted a petition to the National Oceanographic and Atmospheric Administration (NOAA) Channel Islands National Marine Sanctuary to reclassify the SMR extensions into federal waters (known as federal marine reserves) as federal marine conservation areas.

Stated Intent

In summary, the petitioner explains that HMS and pelagic finfish, including swordfish, were not intended to be protected by these MPAs and that allowing take of these species would provide economically beneficial and sustainable commercial fishing opportunities while minimally impacting the ecosystem due to the selective nature of the proposed gear. They state that, "The allowance of limited pelagic or highly migratory take in these areas falls in line with the adaptive management measures set forth in the [2023 MPA] Decadal Management Review (DMR) and reinforced by the Marine Resource [Committee's] near-term [DMR] recommendations. The further highlights that "…the proposed changes also fall in line with the

MPA Master Plan science guidelines [for high level-of-protection MPAs], and align with FGC comments on previous change request petitions." See Exhibit 1 for more details.

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 this meeting's comment deadline 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, including for Petition 2023-15MPA_AM2 (Exhibit 3). The Department also released a companion document, to offer essential context that is intended to be reviewed before the individual petition evaluations.

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 will present Petition 2023-15MPA_AM2 and describe any proposed changes since the March 2025 amendment deadline. This meeting provides petitioners an opportunity to engage in dialogue with the Commission alongside robust public participation.

All meeting 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. An organization representing commercial fishermen, industry partners, and others dependent upon access to California's coastal resources supports the proposed changes. The organization emphasizes that the petition would help to maintain economic stability of commercial fishermen without undermining conservation objectives for the MPAs, as the target species are highly mobile and therefore are species less likely to benefit from static MPA boundaries. (Exhibit 4)
2. A recreational angler and diver from northern California who frequently recreates on the central California coast shares appreciation for increased opportunities for access this petition would provide, but expresses wariness about the potential need to trade access elsewhere in the network to balance the proposed change. Overall, they support the Department's recommendation to deny the petition. (Exhibit 5)

Recommendation

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

Department: Deny all petition actions, for the reasons detailed in Exhibit 3. In summary:

- The proposed change to reclassify Footprint SMR [and] Federal Marine Reserve to an SMCA [and] Federal Marine Conservation Area to allow use of deep set buoy gear (DSBG), commercial take of swordfish by harpoon, and various combinations of other recreational and/or commercial take, does not advance adaptive management recommendations from the Decadal Management Review or address a current or emerging MPA management challenge.
- Furthermore, the change would conflict with the original goals of these MPAs, create enforcement feasibility issues, and require coordination and a corresponding rulemaking with the NOAA Channel Islands National Marine Sanctuary (CINMS).
- To date, CINMS has not indicated to the Department that protection level modifications appear needed in order to better support the goals established for these MPAs.
- There is not sufficient evidence to demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

Exhibits

1. Petition 2023-15MPA_AM2, received November 22, 2023, first amended January 9, 2025, and again amended March 14, 2025
2. Packet of comments, received November 2023 through April 16, 2026
3. Department evaluation of Petition 2023-15MPA_AM2, received March 20, 2026
4. Letter from David Colker, Executive Director, Ventura County Commercial Fishermen's Association, received April 21, 2026
5. Email from Rick Duenas, received April 22, 2026

Motion (N/A)

Staff Summary for February 11-12, 2026
(For Background Purposes Only)

19. Inland Sport Fishing

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

(A) **Central Valley sport fishing (annual)**
Consider authorizing publication of notice of intent to amend Central Valley sport fishing regulations.

(B) **Klamath River Basin sport fishing (annual)**
Consider authorizing publication of notice of intent to amend Klamath River Basin sport fishing regulations related to Chinook salmon.

Summary of Previous/Future Actions

(A) ***Central Valley***

• Wildlife Resources Committee (WRC) vetting	September 11, 2025; WRC
• **Today's notice hearing**	**February 11-12, 2026**
• Discussion hearing	April 15-16, 2026
• Adoption hearing	May 6, 2026

(B) ***Klamath River Basin***

• WRC vetting	September 11, 2025; WRC
• **Today's notice hearing**	**February 11-12, 2026**
• Discussion hearing	April 15-16, 2026
• Adoption hearing	May 6, 2026

Background

The Commission adopts Central Valley sport fishing regulations and Klamath River Basin sport fishing regulations on an annual basis to align state regulations with federal fishery management recommendations made by the Pacific Fishery Management Council (PFMC). PFMC will adopt its final regulatory recommendations in April 2026 for the upcoming season based on salmon abundance estimates and recommended ocean harvest.

Historically, the Commission has not amended regulations for fall and spring Klamath River Chinook salmon (KRFC and KRSC, respectively) sport fishing concurrently in its annual rulemaking. However, the KRSC sport fishery has been closed multiple times in the recent past through emergency regulations. The current stock status and need to compensate for large-scale changes in fishery effort necessitate the Commission considering annual changes to the regulations for this fishery. As a result, beginning with the 2025 season, the Department recommends that the Commission incorporate the management of KRSC into the annual Klamath sport fish rulemaking process.

The broad scope of the options in the draft initial statement of reasons and draft proposed regulatory language (exhibits A2, A3, B2, and B3) intentionally allows for flexibility in

developing the final regulations for each rulemaking, which is necessary to allow the Commission to quickly adopt regulations given the timing of the PFMC process. The Department will recommend specific regulations to the Commission at its April 2026 meeting for potential adoption at its May 2026 meeting.

Multiple options are presented today for bodies of water within each rulemaking.

(A) ***Central Valley***

- Option 1 – Allows the take of any size Chinook salmon up to the daily bag limits [0-4] and possession limits [0-12].
- Option 2 – Allows the take of a limited number of adult Chinook salmon, with grilse Chinook salmon making up the remainder of the daily bag limits [0-4] and possession limits [0-12]
- Option 3 – Allows a grilse-only Chinook salmon fishery up to the daily bag limit [0-4] and possession limit [0-12].
- Option 4 – Closed to the take and possession of Chinook salmon.

Additionally, a range of dates is indicated in [brackets] to allow for the ability to start the sport fishing season on a later date or end the season on an earlier date, per section of river or across the valley.

(B) ***Klamath River Basin***

- Option 1
  - Klamath River Fall Chinook (KRFC) Adult Stocks (Sport Fishery Quota Management)
    - Quota range of 0-67,600 adult KRFC, with a subquota applied to each section of river
    - Bag limit of [0-4] Chinook salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until a subquota is met in a section, then 0 fish over [20-24] inches total length for that section.
    - Possession limit of [0-12] Chinook salmon – of which no more than [0- 4] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.
  - Klamath River Spring Chinook (KRSC)
    - Bag limit of [0-1] Chinook salmon
    - Possession limit of [0-2] Chinook salmon
- Option 2
  - KRFC fishery closure
  - KRSC fishery closure

Staff Summary for February 11-12, 2026
(For Background Purposes Only)

Significant Public Comments (N/A)

Recommendation

Commission staff: Authorize publication of notices for Central Valley sport fishing and Klamath River Basin sport fishing as recommended by the Department.

Wildlife Resources Committee: Authorize publication of notices as recommended by the Department.

Department: Authorize publication of notices consistent with the draft initial statement of reasons and draft proposed regulatory language.

Exhibits

A1. Department memo, received January 22, 2026
A2. Draft initial statement of reasons (Central Valley)
A3. Draft proposed regulatory language (Central Valley)
A4. Draft economic and fiscal impact statement (STD. 399) (Central Valley)
A5. Department presentation (Central Valley)
B1. Department memo, received January 6, 2026
B2. Draft initial statement of reasons (Klamath River Basin)
B3. Draft proposed regulatory language (Klamath River Basin)
B4. Draft economic and fiscal impact statement (STD. 399) (Klamath River Basin)
B5. Department presentation (Klamath River Basin)

Motion

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend subsection 7.40(b)(4) et al., related to Central Valley sport fishing regulations.

AND

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend subsection 7.40(b)(50), related to Klamath River Basin sport fishing regulations.

State of California
Fish and Game Commission
Initial Statement of Reasons for Regulatory Action
Amend Subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40
Title 14, California Code of Regulations
Re: Central Valley Sport Fishing Regulations

I. Date of Initial Statement of Reasons: December 20, 2025

II. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: February 12, 2026 Location: Sacramento

(b) Discussion Hearing

Date: April 16, 2026 Location: Sacramento

(c) Adoption Hearing:

Date: May 6, 2026 Location: Webinar/Teleconference

III. Description of Regulatory Action

(a) Statement of Specific Purpose of Regulatory Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 prescribe the 2026 season dates and daily bag and possession limits for Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Collectively, these four rivers constitute the "Central Valley fishery" for SRFC for purposes of this document (**Figure 1**). Each year, the Department of Fish and Wildlife (Department) recommends new Chinook salmon daily bag and possession limits for consideration by the Fish and Game Commission (Commission) to align with up-to-date management goals, as set forth below.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of recreational and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

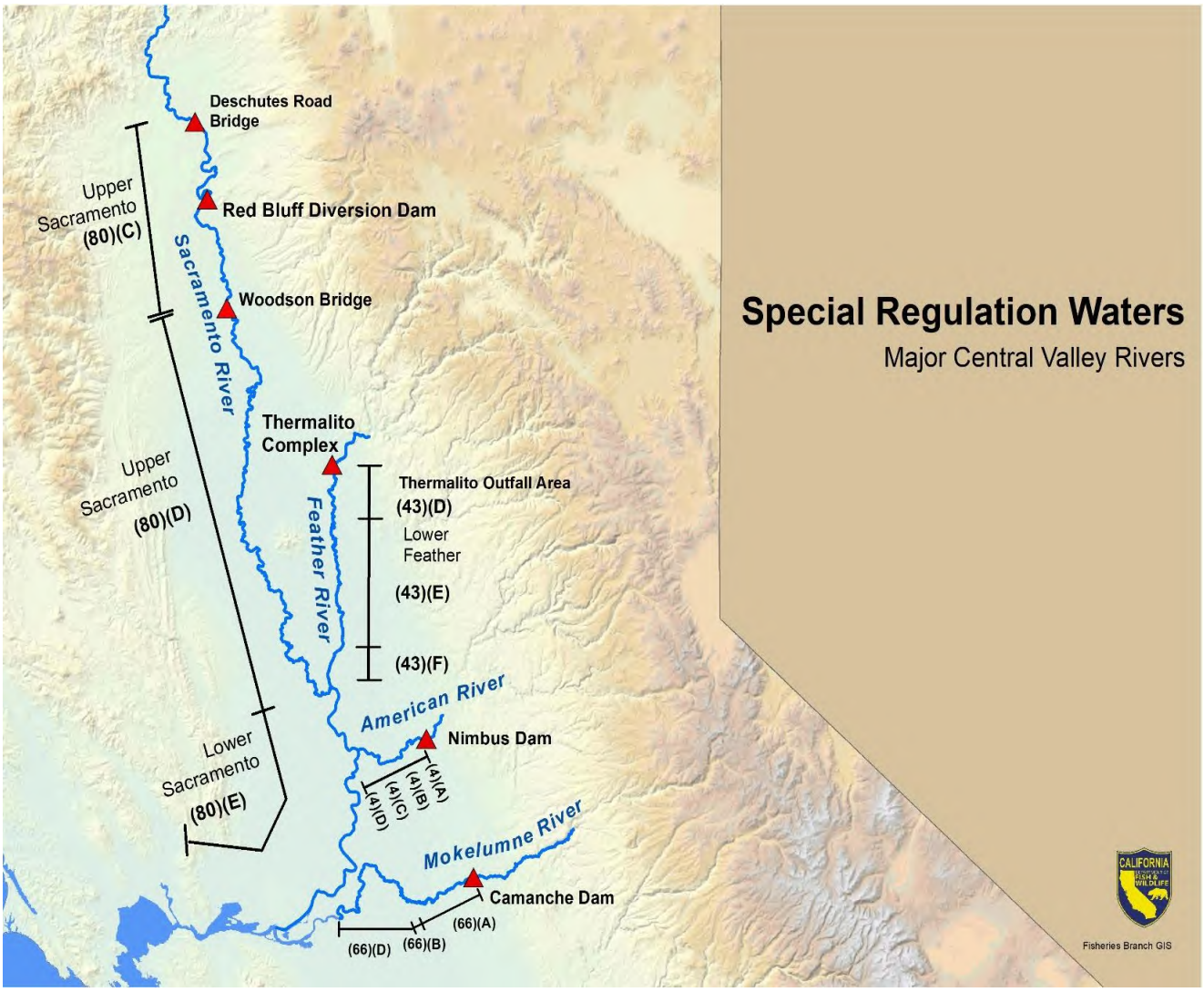

Figure 1. Map of the current "Central Valley fishery" for Sacramento River fall-run Chinook salmon, encompassing the following rivers and their respective subsections of Section 7.40: American (b)(4), Feather (b)(43), Mokelumne (b)(66), and Sacramento (b)(80).

The PFMC will develop the annual Pacific Coast ocean salmon fisheries regulatory options for public review at its March 2026 meeting and will adopt its final regulatory recommendations at its April 2026 meeting based on the PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season. Based on the April 2026 recommendation by PFMC, the Department will recommend specific bag and possession limit regulations for the Central Valley fishery to the Commission at its April 16, 2026 meeting. The Commission will then consider adoption of the Central Valley sport fishing regulations at its May 6, 2026, meeting.

(b) Proposed Regulations

Chinook Salmon Fishing Seasons

The current open fishing seasons for SRFC in the Central Valley are specific to each river and river section and have start and end dates that encompass the migration periods for salmon to upstream spawning habitat in the American, Feather, Sacramento, and Mokelumne rivers. In recent years, low rivers flows, caused by low precipitation, and/or low salmon abundance estimates have forced the Commission to close salmon fishing to protect all salmon

populations in the Central Valley. Low river flows can cause adult salmon to delay their upstream migration to spawning habitat and prevent access for salmon to their natal streams. In some years, a complete fishing closure is necessary to minimize fishery impacts during stressful environmental conditions, such as low flows, and low adult returns. In other years, however, a shortened fishing season may be enough to protect salmon populations in the Central Valley. To avoid a complete fishing closure when feasible, the Commission needs the flexibility to annually adjust the SRFC fishing season lengths on the American, Feather, Mokelumne, and Sacramento rivers.

To address this, annually the Department proposes a range of dates encompassed within the historical open fishing season window (e.g., July 16 through Dec 31) specific to each river section. As done with bag and possession limits, the Department will recommend river section-specific seasons based on salmon abundance estimates and recommendations for ocean harvest for the coming season determined by PFMC at its April 2026 meeting. Having this flexibility will allow the Commission and Department to provide fishing opportunity while still protecting salmon populations.

Separate Chinook Salmon Seasons from other Sport Fish Species Seasons

Under existing regulations, the open fishing seasons for Chinook Salmon in the Central Valley are presented in the same row in the regulatory text table as other sport fish species including steelhead trout, Striped Bass, and Shad. The Commission's recent change of the Chinook Salmon fishing seasons from a static, uniform date range to a range of dates does not apply to other sport fish species. The existing fishing seasons for other sport fish species will remain unchanged. Therefore, it is necessary to uncouple the fishing seasons for these distinct fisheries throughout the regulatory text. The separated seasons are indicated in the Proposed Regulatory Language by having Chinook Salmon in a separate row in the table from the other sport fish species including hatchery steelhead and hatchery trout. This change does not alter the season for non-Chinook Salmon sport fish opportunities but rather combines and consolidates the season into one row in the table.

Chinook Salmon Bag and Possession Limits

The Department recognizes the uncertainty of SRFC in-river harvest projections. Therefore, for the 2026 Central Valley fishery, the Department is presenting four regulatory options for the Commission's consideration to tailor 2026 Central Valley fishery management to target 2026 in-river fisheries harvest projections. The Commission may adopt these options for each river section independently, or in combination to meet PFMC SRFC management objectives and determine the recreational salmon fishing opportunities in the Central Valley.

- Option 1 is the most liberal of the options, and allows take of any size Chinook Salmon up to the daily bag and possession limits.
- Option 2 allows for take of a limited number of adult Chinook Salmon, with grilse Chinook salmon (two-year old salmon) making up the remainder of the daily bag and possession limits.
- Option 3 is a more conservative option, and allows for a grilse-only Chinook Salmon fishery.
- Option 4 is the most conservative option, and prohibits the take and possession of Chinook Salmon in all anadromous areas of and tributaries to the American, Feather, Mokelumne, and Sacramento rivers.

Key to Proposed Regulatory Changes:

Because the PFMC recommendations are not known at this time, a range of bag and possession limits shown in [brackets] is indicated in the text below where it is desirable to continue Chinook Salmon fishing in the American, Feather, Mokelumne, and Sacramento rivers. **Additionally, the respective fishing season date range is indicated in [brackets] to allow for the ability to start the season later or end the season earlier, per section of river or across the valley.**

The following options are provided for Commission consideration:

Option 1 – Any Size Chinook Salmon Fishery

This option would allow anglers to take up to [0-4] Chinook Salmon of any size per day and have [0-12] Chinook Salmon in possession. This option is the Department's preferred option if the 2026 SRFC stock abundance forecast is sufficiently high to avoid the need to constrain in-river SRFC harvest.

American River, subsection 7.40(b)(4):

(B) From the United States Geological Survey (USGS) gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook salmon.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(E) From 200 yards above the Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook salmon.

Possession limit – [0-12] Chinook Salmon.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Mokelumne River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.
[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Option 2 – Limited Adult and Grilse Salmon Fishery

This option would allow the take of a limited number of adult Chinook Salmon, with grilse Chinook Salmon (two-year-old salmon) making up the remainder of the daily bag and possession limits. This option would allow anglers to take up to [0-4] Chinook Salmon per day, with no more than [0-4] of those salmon over 27 inches total length, and have [0-12] Chinook Salmon in possession, of which no more than [0-12] salmon may be over 27 inches total length. Should a reduction in the adult component of the stock be indicated by PFMC harvest projections, the Department is recommending specifying angling opportunities on the smaller, and possibly more numerous grilse salmon to increase angling harvest opportunities. Grilse returns from the previous season are included in pre-season stock abundance forecasts, but are not included in the current season adult returns used for evaluating conservation targets for SRFC. Due to their smaller size, grilse are typically outcompeted by larger adults, and contribute significantly less to the spawning population, and so they would be available for harvest with minimal impact to juvenile recruitment for the current season. Take of adult salmon would be limited under regulation, and the subsequent juvenile production would help rebuild the depressed stock size at a time when there is the need to restrict harvest of adult salmon.

The Department recommends a grilse salmon size limit of less than or equal to 27 inches total length based on an analysis of grilse data conducted by Department staff in 2018 (refer to Section III(g) below). A 27-inch total length grilse salmon cutoff is the best balance between angling harvest opportunity of possibly abundant smaller, two-year old male salmon and preserving the limited number of females available to spawn.

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0–12] fish may be over 27 inches total length.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Mokelumne River, subsection 7.40(b)(66)

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Option 3 – Grilse-only Salmon Fishery

This option would allow for a grilse-only salmon fishery. This option would allow anglers to take [0-4] Chinook Salmon with a maximum size of 27 inches total length and have [0-12] Chinook Salmon in possession, with a maximum size of 27 inches total length. Should a reduction in the adult component of the stock be indicated by PFMC harvest projections, the Department is recommending specifying angling opportunities on the smaller, and possibly more numerous grilse salmon to increase angling harvest opportunities. Grilse returns from the previous season are included in pre-season stock abundance forecasts, but are not included in the current season adult returns used for evaluating conservation targets for SRFC. Due to their

smaller size, grilse are typically outcompeted by larger adults, and contribute significantly less to the spawning population, and so they would be available for harvest with minimal impact to juvenile recruitment for the current season. Take of adult salmon would be prohibited under regulation, and the subsequent juvenile production would help rebuild the depressed stock size at a time when there is the need to restrict harvest of adult salmon.

The Department recommends a grilse salmon size limit of less than or equal to 27 inches total length based on an analysis of grilse data conducted by Department staff in 2018 (refer to Section III(g) below). A 27-inch total length grilse salmon cutoff is the best balance between angling harvest opportunity of possibly abundant smaller, two-year old male salmon and preserving the limited number of female salmon available to spawn.

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower

boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit – [0-12] Chinook Salmon less than or equal to 27 inches total length.

Mokelumne River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including lake Lodi.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Option 4 – No Salmon Fishing in all Central Valley Rivers, Streams, and Tributaries

This option would close salmon fishing in the American, Feather, Mokelumne, and/or Sacramento rivers, and all associated tributaries, or specific areas/bodies of water, as specified by river reach(es) in subsection 7.40(b) to provide protection to SRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure to ocean recreational salmon fishing, this option will give the Department flexibility to respond to and support any federal action in the ocean. This option prohibits all methods of targeting salmon including catch and release fishing. Unless otherwise noted, this option would still allow take of other species in specific areas/bodies of water, as specified by river reach(es) in subsection 7.40(b) (See Section VII below).

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

July 16 through October 31. No take or possession of Chinook Salmon.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

July 16 through December 31. No take or possession of Chinook Salmon.

(D) From the Jibboom Street bridge to the mouth.

July 16 through December 16. No take or possession of Chinook Salmon.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

July 16 through October 31. No take or possession of Chinook Salmon.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge. For purposes of this subsection, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marine boat ramp.

July 16 through December 16. No take or possession of Chinook Salmon.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

July 16 through December 16. No take or possession of Chinook Salmon.

Mokelumne River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

July 16 through October 15. No take or possession of Chinook Salmon.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

From July 16 through December 31. No take or possession of Chinook Salmon.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

From July 16 through December 16. No take or possession of Chinook Salmon.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

August 1 through October 31, and November 1 through December 31. No take or possession of Chinook salmon.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

July 16 through December 16. No take or possession of Chinook Salmon.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

July 16 through December 16. No take or possession of Chinook Salmon.

Brown Trout Harvest Opportunity in Sections of the Sacramento River

Non-native Brown Trout have occasionally been caught in the steelhead trout fishery on the Sacramento River, particularly in the reaches below Keswick Dam. Brown Trout are highly piscivorous and are known to prey upon juvenile Chinook Salmon, Coho Salmon and steelhead trout in locations where their presence overlaps, which can suppress native species recovery. The Department is proposing to allow the harvest of Brown Trout in the Sacramento River. This proposed change will reduce predation on juvenile salmon and steelhead and align these regulations with existing regulations for Brown Trout in anadromous waters. The proposed regulations add take for Brown Trout to Section 7.40, subsections (b)(80)(B)(1) and (2) and (C) with a bag limit of 5 fish per day and 10 fish in possession. A harvest of 5 Brown Trout is appropriate given the recent catch and observations by the Department.

(c) Necessity of the Proposed Regulation Changes

The proposed regulations are necessary to adjust Chinook Salmon bag and possession limits, size limits, open seasons, and season lengths for the American, Feather, Mokelumne, and Sacramento rivers for consistency with PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season.

The proposed regulations are also necessary to decouple the steelhead and proposed Brown Trout fishery season date ranges from that of Chinook Salmon in the regulatory text. As well as provide harvest opportunity on the non-native Brown Trout in the upper most reaches of the Sacramento River.

(d) Goals and Benefits of the Regulation

As stated in Fish and Game Code Section 1700, Conservation of Aquatic Resources: It is the policy of this state to encourage the conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the state for the benefit of all the citizens of the state and to promote the development of local fisheries and

distant water fisheries based in California in harmony with international law, respecting fishing and the conservation of the living resources of the ocean and other waters under the jurisdiction and influence of the state. The objectives of this policy include, but are not limited to, the maintenance of sufficient populations of all species of aquatic organisms to ensure their continued existence, and the maintenance of a sufficient resource to support a reasonable sport use.

Adoption of science-based SRFC bag and possession limits provides for the maintenance of sufficient populations of Chinook Salmon to ensure their continued existence. The adoption of flexible season lengths will enable the Commission and Department to provide fishing opportunity while minimizing risk of overharvest.

The benefits of the proposed regulations are consistency with federal fishery management goals, sustainable management of the SRFC fishery, and general health and welfare of California residents.

(e) Authority and Reference Sections from Fish and Game Code for Regulation

Authority: Sections 200, 205, 265, 270, 315, 316.5, 399 and 2084, Fish and Game Code.

Reference: Sections 200, 205, 265, 270, 316.5 and 2084, Fish and Game Code.

(f) Specific Technology or Equipment Required by Regulatory Change

None.

(g) Identification of Reports or Documents Supporting Regulation Change

NOAA's National Marine Fisheries Service, West Coast Region, 2016. *5-Year Review: Summary and Evaluation of Central Valley Spring-run Chinook salmon Evolutionarily Significant Unit. Available from: https://repository.library.noaa.gov/view/noaa/17018*

Pacific Fishery Management Council, 2023. *Review of 2022 Ocean Salmon Fisheries: Stock Assessment and Fishery Evaluation Document for the Pacific Coast Salmon Fishery Management Plan*. Available from: https://www.pcouncil.org/documents/2023/02/review-of-2022-ocean-salmon-fisheries.pdf/

Pahlke, K, 1988. *Length Conversion Equations for Sockeye, Chinook, and Coho salmon in southeast Alaska. Regional Information Report No. Ij88-03.* Alaska Department of Fish and Game Division of Commercial Fisheries, Southeast Region. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=164436&inline

U.S. Fish and Wildlife Service, *2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, available from* https://www.census.gov/content/dam/Census/library/publications/2018/demo/fhw16-nat.pdf

Palmer-Zwahlen, M., V. Gusman, and B. Kormos. 2019a. *Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2014*. California Department of Fish and Wildlife. Technical Report.

Palmer-Zwahlen, M., V. Gusman, and B. Kormos. 2019b. *Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2015*. California Department of Fish and Wildlife. Technical Report.

Palmer-Zwahlen and B. Kormos. 2020. *Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2016*. California Department of Fish and Wildlife. Technical Report.

Letvin, A., M. Palmer-Zwahlen and B. Kormos. 2020. *Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2017*. California Department of Fish and Wildlife. Technical Report.

Letvin, A., M. Palmer-Zwahlen, B. Kormos and P. McHugh. 2021. *Recovery of Coded-Wire Tags from Chinook Salmon in California's Central Valley Escapement, Inland Harvest, and Ocean Harvest in 2019.* California Department of Fish and Wildlife. Technical Report.

(h) Public Discussions of Proposed Regulations Prior to Notice Publication

The Department presented the proposed amendments to the SRFC bag and possession limits at the Commission's Wildlife Resources Committee meeting on September 11, 2025.

IV. Description of Reasonable Alternatives to Regulatory Action

(a) Alternatives to Regulation Change

No alternatives were identified by or brought to the attention of Commission staff that would have the same desired regulatory effect.

(b) No Change Alternative

SRFC Adult Stocks

The no change alternative would leave the existing 2025 fishing regulations in place. The current regulations provide limited fishing opportunities for SRFC in the Central Valley. The no change alternative would not allow for an increase in fishing opportunity for SRFC in 2026 even if the 2026 SRFC stock abundance forecast is sufficiently high to allow for additional in-river sport harvest of SRFC. The proposed regulations will allow the state to harmonize its bag limits, possession limits, and harvest season lengths with NMFS' regulations.

The no change alternative would not allow for the decoupling the Chinook Salmon season date ranges from that of other sport fish in the regulatory text. As well as provide harvest opportunity on the non-native Brown Trout in the upper most reaches of the Sacramento River.

V. Mitigation Measures Required by Regulatory Action

The proposed regulatory action will have no negative impact on the environment; therefore, no mitigation measures are needed.

VI. Impact of Regulatory Action

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

(a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in

other states. The proposed changes are necessary for the continued preservation of the resource, while providing inland sport fishing opportunities and thus, the prevention of adverse economic impacts.

(b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment

The Commission does not anticipate significant adverse economic impacts but acknowledges the potential for short-term negative impacts on the creation or elimination of jobs within the state. The Commission anticipates no adverse impacts on the creation of new business, the elimination of existing businesses or the expansion of businesses in California. The management of an ongoing Chinook Salmon sport fishery with annual variations in the bag and possession limits and/or the implementation of a size limit is not anticipated to significantly impact the volume of business activity.

The reduction of up to 24 jobs from the historical baseline with Option 2, 47 jobs for Option 3, and 119 jobs for Option 4 is not expected to eliminate businesses because projected reduction in fishing days is expected to be partially offset by opportunities to fish for grilse Chinook salmon and other species for Option 2 and 3 and continued opportunities for other salmonid (steelhead/ Rainbow trout) and non-salmonid species for Option 4. Additionally, all options represent a net gain in angler days from the 2025 season and could potentially result in gains of 55-174 jobs based on the selected option (see Table 1 below).

The Commission anticipates general benefits to the health and welfare of California residents through responsibly managed outdoor recreational opportunities. Providing opportunities for a Chinook Salmon sport fishery also encourages consumption of a nutritious food. The Commission anticipates benefits to the environment by the sustainable management of Chinook salmon resources in the Central Valley.

The Commission does not anticipate any benefits to worker safety.

Other benefits of the proposed regulations are concurrence with federal fishery management goals and promotion of businesses that rely on Central Valley sport fishing.

(c) Cost Impacts on a Representative Private Person or Business

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None.

(e) Nondiscretionary Costs/Savings to Local Agencies: None.

(f) Programs Mandated on Local Agencies or School Districts: None.

(g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.

(h) Effect on Housing Costs: None.

VII. Economic Impact Assessment

This action is expected to sustain fishery activity within the range of historically typical seasons. Lower PFMC harvest forecasts can result in a smaller bag and possession limit, (more conservative), whereas larger PFMC harvest forecasts can result in a higher bag and possession limit (more liberal), both of which can skew the average fishing activity over seasons. The potential difference in total economic impact between a typical season and the options under consideration is up to $8.4 million (2026$) as shown in Table 1 below. However, the anticipated total economic impacts may vary a bit more or less than the estimates of any one single option, as the proposed options may be adopted as a combination of bag and possession limits by body of water so as to minimize adverse impacts to fishing opportunity and economic activity.

A five-year range over the 2017-2025 seasons (the 2023 and 2024 salmon closure years are excluded in the baseline) for the Central Valley fishery experiences on average 174,192 sport salmon angler days in which anglers spend an average of $118.84 (2026$) per day contributing approximately $29.1 million (2026$) in direct expenditures to California businesses. This expenditure is received by area businesses that spend a share on inputs and payroll. As employees receive income, their household spending again circulates in the local economy and statewide. These multiplier effects have historically resulted in an estimated total economic impact of approximately $29.1 Million (2026$), that supports up to 237 jobs throughout the state.

The regional and statewide economic impacts factor into the effort to balance the maintenance of the recreational fishery with resource preservation, while complying with PFMC allocations. The potential economic impacts that may result from each in-river harvest projection as specified in Option 1, Option 2, Option 3, and Option 4 are evaluated in terms of each scenario's probable impact on the number of Chinook salmon and other species' angler days, and thus angler expenditures that circulate within the area and throughout the state. The impacts are measured by comparing the options with the economic impact from the 2025 season, which included approximately 46,646 angler days based on annual creel survey data.

Table 1. Central Valley Fishery Projected Economic Impacts 2026

Regulation	Angler Days	Angler Expenditures	Total Econ Impact	Jobs
Option 1	174,1921[1]	$20,700,221	$29,107,692	237
Option 2	156,773	$18,630,199	$26,196,923	214
Option 3	139,364	$16,560,177	$23,286,154	190
Option 4	87,096[2]	$10,350,111	$14,553,846	119
Year	**Angler Days**	**Angler Expenditures**	**Total Econ Impact**	**Jobs**
2025	46,646	$5,543,208	$7,794,603	64
Regulation	**Angler Day Gains From 2025**	**Expenditure Gains From 2025**	**Total Impact Gain From 2025**	**Job Gains From 2025**
Option 1	127,546	$15,157,013	$21,313,089	174
Option 2	110,127	$13,086,991	$18,402,320	150
Option 3	92,708	$11,016,969	$15,491,551	126
Option 4	40,450	$4,806,902	$6,759,243	55

[1]The base year for angler days is the five-year average of 2017–2021 derived from Department creel survey data. The 2017-2021 time period is more historically typical with no emergency actions that reduced fishing opportunity.

[2]Projected angler days with a salmon closure assumes that 50% of effort will persist as anglers shift or continue to pursue opportunities for other fish species. Sources: California Department of Fish and Wildlife, Fisheries Branch economic analysis; U.S. Fish and Wildlife Service,

2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation; expenditure figures are in (2026$), adjusted for inflation with Implicit Price Deflator for Personal Consumption Expenditures, Bureau of Economic Analysis.

Historical correlations between catch limits and fishery participation levels suggest that Option 1 could enable an historically (5-year average) typical number of angler days for the 2026 Chinook Salmon season on the American, Feather, Mokelumne, and Sacramento rivers. Option 2 may result in declines in angler days of 17,419 below a typical year but still represent an increase of 110,127 angler days from the 2025 season. Option 3 may result in larger declines but with an increase of 92,708 angler days from the previous season. Option 4 is expected to result in a 50 percent decline from the historical average but an increase in 40,450 angler days from 2025.

A share (approximately 50% for all options) of anglers are assumed to continue pursuing other in-river sport fish aside from Chinook salmon, such as steelhead (*Oncorhynchus mykiss*), striped bass (*Morone saxatilis*), largemouth bass (*Micropterus salmoides*), sturgeon (*Acipenser transmontanus*) and catfish (*Ictalurus spp.*), and that may mitigate some adverse impacts from any reductions in salmon fishing. Additionally, the proposed regulations to increase the Brown Trout bag limit to five fish per day with 10 fish in possession should provide additional opportunities for anglers. In sum, the options presented to the Commission were conceived with the goal of enabling levels of recreational SRFC fishing in the range of historical averages and thus should not be a source of significant adverse economic impacts.

(a) Effects of the Regulation on the Creation or Elimination of Jobs Within the State

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the creation or elimination of jobs. For Option 1, no change in job creation or elimination is anticipated. Option 2, Option 3, and Option 4 have the potential to result in fewer angler visits, and absent substitution toward other sportfish and/or activities in the affected areas, the reduction in angler spending could reduce the support for 0-119 jobs statewide. However, all options represent a net gain in angler days from the 2025 season and could potentially result in gains of 55-174 jobs based on the selected option.

(b) Effects of the Regulation on the Creation of New Businesses or the Elimination of Existing Businesses Within the State

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the creation of new business or the elimination of existing businesses, because the proposed economic impacts of the regulations are unlikely to be substantial enough to stimulate the creation of new businesses or cause the elimination of existing businesses.

(c) Effects of the Regulation on the Expansion of Businesses Currently Doing Business Within the State

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the expansion of businesses currently doing business within the state. The proposed regulations are not anticipated to increase demand for services or products from the existing businesses that serve inland sport fishermen. The number of fishing trips and angler economic contributions are expected to remain within the range of historical averages.

(d) Benefits of the Regulation to the Health and Welfare of California Residents

The Commission anticipates benefits to the health and welfare of California residents. Chinook Salmon is a nutritious food source and providing inland sport fishery opportunities encourages consumption of this nutritious food. Sport fishing also contributes to increased mental health of its practitioners, as fishing is a hobby and form of relaxation for many. Sport fishing also provides opportunities for multi-generational family activities and promotes respect for California's environment by younger generations, the future stewards of California's natural resources.

(e) Benefits of the Regulation to Worker Safety

The Commission does not anticipate any benefits to worker safety from the proposed regulations because inland sport fishing does not impact working conditions.

(f) Benefits of the Regulation to the State's Environment

Under all options the Commission anticipates benefits to the environment in the sustainable management of SRFC. It is the policy of this state to encourage the conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the state for the benefit of all the citizens of the state and to promote the development of local fisheries and distant water fisheries based in California in harmony with international law, respecting fishing and the conservation of the living resources of the ocean and other waters under the jurisdiction and influence of the state. The objectives of this policy include, but are not limited to, the maintenance of sufficient populations of all species of aquatic organisms to ensure their continued existence, and the maintenance of a sufficient resource to support a reasonable sport use.

In accordance with this policy, adoption of science-based inland Chinook salmon bag and possession limits provides for the maintenance of sufficient populations of salmon to ensure their continued existence and thus continued economic stimulus.

(g) Other Benefits of the Regulation

Other benefits of the regulation include consistency with federal fishery management goals.

Informative Digest/Policy Statement Overview

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 prescribe the 2025 seasons and daily bag and possession limits for Sacramento River fall-run Chinook salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Collectively, these four rivers constitute the "Central Valley fishery" for SRFC for purposes of this document. Each year, the Department recommends new Chinook Salmon bag and possession limits for consideration by the Commission to align the fishing limits with up-to-date management goals, as set forth below.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of recreational and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The PFMC will develop the annual Pacific coast ocean salmon fisheries regulatory options for public review at its March 2026 meeting and will adopt its final regulatory recommendations at its April 2026 meeting based on the PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season. Based on the April 2026 recommendation by PFMC, the Department will recommend specific seasons and bag and possession limit regulations to the Commission at its April 16, 2026, meeting. The Commission will then consider adoption of the Central Valley sport fishing regulations at its May 6, 2026, meeting.

Proposed Regulations

Chinook Salmon Bag and Possession Limits

The Department recognizes the uncertainty of SRFC in-river harvest projections. Therefore, for the 2026 Central Valley fishery, the Department is presenting four regulatory options for the Commission's consideration to tailor 2026 Central Valley fishery management to target 2026 in-river fisheries harvest projections. The Commission may adopt these options for each river section independently, or in combination to meet PFMC SRFC management objectives.

- American River, subsections 7.40(b)(4)(B), (C) and (D).
- Feather River, subsection 7.40(b)(43)(D), (E), and (F).
- Mokelumne River, subsection 7.40(b)(66)(A), (B) and (D).
- Sacramento River below Keswick Dam, subsection 7.40(b)(80)(C), (D) and (E).

The following options are provided for Commission consideration:

Option 1 – Any Size Chinook Salmon Fishery

This option is the Department's preferred option if the 2026 SRFC stock abundance forecast is sufficiently high to avoid the need to constrain in-river SRFC harvest.

Bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

Option 2 – Limited Adult and Grilse Salmon Fishery

Bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0–12] fish may be over 27 inches total length.

Option 3 – Grilse Salmon Fishery Only

Bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Option 4 – No Salmon Fishing in all Central Valley Rivers, Streams, and Tributaries

No take or possession of Chinook Salmon.

Chinook Salmon Fishing Seasons

The current open fishing seasons for SRFC in the Central Valley are specific to each river and river section and have start and end dates that encompass the migration periods for salmon to upstream spawning habitat in the American, Feather, Sacramento, and Mokelumne rivers. To provide angling opportunity while minimizing the risk of overharvest due to uncertainty of SRFC in-river harvest projections, the Department is presenting a range of dates within that historic range that spans the open fishing season specific to each river section. This will provide the Commission with the flexibility to start the season later or end the season earlier, per section of river or across the valley.

Separate Chinook Salmon Seasons from other Sport Fish Species Seasons

Under existing regulations, the open fishing seasons for Chinook Salmon in the Central Valley are presented in the same row in the regulatory text table as other sport fish species including steelhead trout, Striped Bass, and Shad. The Department's recent change of the Chinook Salmon fishing seasons from a static, uniform date range to a range of dates does not apply to other sportfish species. The existing fishing seasons for other sportfish species will remain unchanged. Therefore, it is necessary to uncouple the fishing seasons for these distinct fisheries throughout the regulatory text. The separated seasons are indicated in the Proposed Regulatory Language by having Chinook Salmon in a separate row in the table from the other sport fish species including hatchery steelhead and hatchery trout. This change does not alter the season for non-Chinook Salmon sport fish opportunities but rather combines and consolidates the season into one row in the table.

Brown Trout Harvest Opportunity in Sections of the Sacramento River

Non-native Brown Trout have occasionally been caught in the steelhead trout fishery on the Sacramento River, particularly in the reaches below Keswick Dam. Brown Trout are highly piscivorous and are known to prey upon juvenile Chinook Salmon, Coho Salmon and steelhead trout in locations where their presence overlaps, which can suppress native species recovery. The Department is proposing to allow the harvest of Brown Trout in the Sacramento River. This proposed change will reduce predation on juvenile salmon and steelhead and align these regulations with existing regulations for Brown Trout in anadromous waters. The proposed regulations add take for Brown Trout to Section 7.40, subsections (b)(80)(B)(1) and (2) and (C) with a bag limit of 5 fish per day and 10 fish in possession. A harvest of 5 Brown Trout is appropriate given the recent catch and observations reported to the Department.

(a) Benefits of the Proposed Regulations

The Commission anticipates benefits to the environment in the sustainable management of Central Valley Chinook Salmon resources. Other benefits of the proposed regulations are consistency with federal fishery management goals, and health and welfare of California residents.

Consistency and Compatibility with Existing Regulations

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated to the Commission the power to regulate sport fishing in waters of the state (Fish and Game Code sections 200, 205, 315 and 316.5). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulations. The Commission has searched the California Code of Regulations and finds no other state agency regulations pertaining to Chinook Salmon sport fishing seasons, bag, and possession limits for Central Valley sport fishing.

Proposed Regulatory Language

Section 7.40, Title 14, CCR, is amended to read:

§ 7.40. Alphabetical List of Hatchery Trout, Hatchery Steelhead, and Salmon Waters with Special Fishing Regulations.

. . . [No changes to subsections (a) through (b)(3)]...

Note: Shading in grey shows the consolidation of the hatchery trout or hatchery steelhead seasons.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(4) American River (Sacramento Co.).		
(A) From Nimbus Dam to the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site.	Closed to all fishing all year.	
(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.	Jan. 1 through ~~Jul. 15~~Oct. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Oct. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 15 for Chinook Salmon.~~ [Jul. 16 – Oct. 31] through [Jul.16 – Oct. 31]. Only barbless hooks may be used.	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		Option 4: Closed to the take and possession of Chinook Salmon.
(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 31] through [Jul.16 – Dec. 31].	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.

(D) From the Jibboom Street bridge to the mouth.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon~~ [Jul. 16 – Dec. 16] through [Jul.16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(5) through (b)(42)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(43) Feather River below Fish Barrier Dam (Butte, Sutter and Yuba cos.).		
(A) From Fish Barrier Dam to Table Mountain bicycle bridge in Oroville.	Closed to all fishing all year.	
(B) From Table Mountain bicycle bridge to Highway 70 bridge.	Jan. 1 through Jul. 15. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
(C) From Highway 70 bridge to the unimproved boat ramp above the Thermalito Afterbay Outfall.	All year.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Oct. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Sept. 15 for Chinook Salmon.~~ [Jul. 16 – Oct. 31] through [Jul.16 – Oct. 31].	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	~~Nov. 1 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~
(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 to Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~
(F) From the Highway 99 bridge to the mouth. For purposes of this subsection, the lower	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.

boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~ [Jul. 16 – Dec.16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 to Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(44) through (b)(65)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(66) Mokelumne River (San Joaquin Co.).		
(A) From Camanche Dam to Elliot Road.	Jan. 1 through Mar. 31.	1 hatchery trout or hatchery steelhead**.
	Fourth Sat. in May through ~~Jul.15~~ Oct. 15.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Oct. 15 for hatchery trout or hatchery steelhead.~~	~~1 hatchery trout or hatchery steelhead**.~~
	~~Jul. 16 through Sept. 15 for Chinook Salmon.~~ [Jul. 16 – Oct.15] through [Jul. 16 – Oct. 15].	~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(B) From Elliot Road to the Woodbridge Irrigation District Dam including Lodi Lake.	Jan. 1 through ~~Jul. 15~~Dec. 31.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 15 for Chinook Salmon.~~	~~1 hatchery trout or hatchery steelhead**.~~ ~~1 Chinook Salmon.~~

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	[Jul. 16 – Dec. 31] through [Jul. 16 – Dec. 31].	**Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(C) Between the Woodbridge Irrigation District Dam and the Lower Sacramento Road bridge.	Closed to all fishing all year.	
(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.	Jan. 1 through ~~Jul. 15~~Dec. 31.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~1 hatchery trout or hatchery steelhead**.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		[0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~1 hatchery trout or hatchery steelhead**.~~

. . . [No changes to subsections (b)(67) through (b)(79)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(80) Sacramento River and tributaries below Keswick Dam (Butte, Colusa, Contra Costa, Glenn, Sacramento, Shasta, Solano, Sutter, Tehama, and Yolo Cos.).		
(A) Sacramento River from Keswick Dam to 650 feet below Keswick Dam.	Closed to all fishing all year.	
(B) Sacramento River from 650 feet below Keswick Dam to the Highway 44 bridge.		
1. Sacramento River from 650 feet below Keswick Dam to the Highway 44 bridge.	Jan 1. through Mar. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. 5 Brown Trout. 10 Brown Trout in possession.
	Closed to all fishing from Apr. 1 through Jul. 31.	

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	Aug 1. through Dec. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. 5 Brown trout. 10 Brown trout in possession.
2. Sacramento River from the Highway 44 bridge to the Deschutes Road bridge.	All year. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. 5 Brown Trout. 10 Brown Trout in possession.
(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.	Jan. 1 through ~~Jul. 31~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. 5 Brown Trout. 10 Brown Trout in possession.
	~~Aug. 1 through Oct 31 for hatchery trout or hatchery steelhead.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~
	~~Aug 1. through Oct. 31 for Chinook Salmon.~~ [Aug. 1 – Oct. 31] through [Aug. 1 – Oct. 31].	~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		[0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Nov. 1 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Nov. 1 through Dec. 31 for Chinook Salmon.~~ [Nov. 1 – Dec. 31] through [Nov. 1 – Dec.31].	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16].	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~
(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession~~. ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(81) through (b)(123)]. . .

* Wild Chinook Salmon are those not showing a healed adipose fin clip and not showing a healed left ventral fin clip.

**Hatchery trout or steelhead in anadromous waters are those showing a healed adipose fin clip (adipose fin is absent). Unless otherwise provided, all other trout and steelhead must be immediately

released. Wild trout or steelhead are those not showing a healed adipose fin clip (adipose fin is present).

NOTE: Authority cited: Sections 200, 205, 265, 270, 315, 316.5, 399 and 2084, Fish and Game Code. Reference: Sections 200, 205, 265, 270, 316.5 and 2084, Fish and Game Code.

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT

DEPARTMENT NAME	CONTACT PERSON	EMAIL ADDRESS	TELEPHONE NUMBER
California Fish and Game Commission	David Thesell	fgc@fgc.ca.gov	916 201-6201

DESCRIPTIVE TITLE FROM NOTICE REGISTER OR FORM 400	NOTICE FILE NUMBER
Amend Subsections 7.40(b)(4),(43),(66),(80), Title14, CCR Re: Central Valley Sport Fishing	Z

A. ESTIMATED PRIVATE SECTOR COST IMPACTS *Include calculations and assumptions in the rulemaking record.*

1. Check the appropriate box(es) below to indicate whether this regulation:

- [X] a. Impacts business and/or employees
- [X] b. Impacts small businesses
- [X] c. Impacts jobs or occupations
- [ ] d. Impacts California competitiveness
- [ ] e. Imposes reporting requirements
- [ ] f. Imposes prescriptive instead of performance
- [X] g. Impacts individuals
- [ ] h. None of the above (Explain below):

If any box in Items 1 a through g is checked, complete this Economic Impact Statement.
If box in Item 1.h. is checked, complete the Fiscal Impact Statement as appropriate.

2. The California Fish and Game Commission (Agency/Department) estimates that the economic impact of this regulation (which includes the fiscal impact) is:

- [X] Below $10 million
- [ ] Between $10 and $25 million
- [ ] Between $25 and $50 million
- [ ] Over $50 million *[If the economic impact is over $50 million, agencies are required to submit a Standardized Regulatory Impact Assessment as specified in Government Code Section 11346.3(c)]*

3. Enter the total number of businesses impacted: 100-200

Describe the types of businesses (Include nonprofits): Fishing boat owners, tackle stores, guides, food, fuel, lodging, campground vend

Enter the number or percentage of total businesses impacted that are small businesses: 80%

4. Enter the number of businesses that will be created: none eliminated: none

Explain: Anticipated changes in fishing activity are not expected to be large enough to induce business loss/creation.

5. Indicate the geographic extent of impacts:
- [ ] Statewide
- [X] Local or regional (List areas): American, Feather, Mokelumne, & Sacramento rive

6. Enter the number of jobs created: 0 and eliminated: 0

Describe the types of jobs or occupations impacted: Fishing guide, retail salesclerks in sport fishing serving businesses, such as: tackle stores, food, fuel, lodging, and campground vendors.

7. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? [ ] YES [X] NO

If YES, explain briefly:

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
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STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

B. ESTIMATED COSTS *Include calculations and assumptions in the rulemaking record.*

1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? $ N/A*

   a. Initial costs for a small business: $ 0 Annual ongoing costs: $ 0 Years:

   b. Initial costs for a typical business: $ 0 Annual ongoing costs: $ 0 Years:

   c. Initial costs for an individual: $ 0 Annual ongoing costs: $ 0 Years:

   d. Describe other economic costs that may occur: N/A. *This action will set Central Valley sportfishing regulations with no new compliance costs. See Addendum.

2. If multiple industries are impacted, enter the share of total costs for each industry: N/A

3. If the regulation imposes reporting requirements, enter the annual costs a typical business may incur to comply with these requirements. *Include the dollar costs to do programming, record keeping, reporting, and other paperwork, whether or not the paperwork must be submitted.* $

4. Will this regulation directly impact housing costs? ☐ YES ☒ NO

   If YES, enter the annual dollar cost per housing unit: $

   Number of units:

5. Are there comparable Federal regulations? ☐ YES ☒ NO

   Explain the need for State regulation given the existence or absence of Federal regulations: Fish and Game Code (F&G Code) sections 200 and 205, and to ensure consistency with federal salmon sport fishing allocations adopted by PFMC.

   Enter any additional costs to businesses and/or individuals that may be due to State - Federal differences: $ 0

C. ESTIMATED BENEFITS *Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. Briefly summarize the benefits of the regulation, which may include among others, the health and welfare of California residents, worker safety and the State's environment: This action is intended to support the continued sustainability of the salmon and other sport fisheries that benefit sport anglers, the health and welfare of California residents, the State's environment and businesses that support sport fishing activities.

2. Are the benefits the result of: ☐ specific statutory requirements, or ☒ goals developed by the agency based on broad statutory authority?

   Explain: Statute provides the Commission the authority to establish sport fishing regulations (F&G Code sec. 200, 205).

3. What are the total statewide benefits from this regulation over its lifetime? $ $6.8 - 21.3 M annually

4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation: Proposed action is anticipated to maintain historically average levels of fishing activity that is not expected to be enough to induce the expansion of businesses currently doing business within the State.

D. ALTERNATIVES TO THE REGULATION *Include calculations and assumptions in the rulemaking record. Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. List alternatives considered and describe them below. If no alternatives were considered, explain why not: Regulation: Option 1) Any size Chinook Salmon; Alt 1: Option 2) Limited numbers of Adult Salmon and Grilse take; Alt 2: Option 3) Grilse take only; Alt 3: Option 4) No Adult or Grilse Salmon take or possession or catch and release.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

2. Summarize the total statewide costs and benefits from this regulation and each alternative considered:

Regulation: Benefit: $ 21.3 M Cost: $ 0

Alternative 1: Benefit: $ 18.4 M Cost: $ 0

Alternative 2: Benefit: $ 15.5 M Cost: $ 0

3. Briefly discuss any quantification issues that are relevant to a comparison of estimated costs and benefits for this regulation or alternatives: Benefits & costs are only monetary or market values. "Regulation" is Option 1 in ISOR; "Alternative 1" is Option 2; "Alternative 2" is Option 3; another Alt 3 is Option 4 & shown in Addendum.

4. Rulemaking law requires agencies to consider performance standards as an alternative, if a regulation mandates the use of specific technologies or equipment, or prescribes specific actions or procedures. Were performance standards considered to lower compliance costs? ☐ YES ☒ NO

Explain: Fisheries management regulations traditionally involve setting harvest quotas, seasons, bag and possession limits.

E. MAJOR REGULATIONS *Include calculations and assumptions in the rulemaking record.*

California Environmental Protection Agency (Cal/EPA) boards, offices and departments are required to submit the following (per Health and Safety Code section 57005). Otherwise, skip to E4.

1. Will the estimated costs of this regulation to California business enterprises **exceed $10 million**? ☐ YES ☒ NO

If YES, complete E2. and E3
If NO, skip to E4

2. Briefly describe each alternative, or combination of alternatives, for which a cost-effectiveness analysis was performed:

Alternative 1:

Alternative 2:

(Attach additional pages for other alternatives)

3. For the regulation, and each alternative just described, enter the estimated total cost and overall cost-effectiveness ratio:

Regulation: Total Cost $ Cost-effectiveness ratio: $

Alternative 1: Total Cost $ Cost-effectiveness ratio: $

Alternative 2: Total Cost $ Cost-effectiveness ratio: $

4. Will the regulation subject to OAL review have an estimated economic impact to business enterprises and individuals located in or doing business in California exceeding $50 million in any 12-month period between the date the major regulation is estimated to be filed with the Secretary of State through12 months after the major regulation is estimated to be fully implemented?

☐ YES ☒ NO

If YES, agencies are required to submit a Standardized Regulatory Impact Assessment (SRIA) as specified in Government Code Section 11346.3(c) and to include the SRIA in the Initial Statement of Reasons.

5. Briefly describe the following:

The increase or decrease of investment in the State: No impact on level of investment in the State.

The incentive for innovation in products, materials or processes: No impact on level of innovation in the State.

The benefits of the regulations, including, but not limited to, benefits to the health, safety, and welfare of California residents, worker safety, and the state's environment and quality of life, among any other benefits identified by the agency: Regulation benefits are consistency w/federal fishery management goals, management of the CV fishery, health of residents & rec. businesses.

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT

A. FISCAL EFFECT ON LOCAL GOVERNMENT *Indicate appropriate boxes 1 through 6 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year which are reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

☐ a. Funding provided in _____

Budget Act of _____ or Chapter _____ , Statutes of _____

☐ b. Funding will be requested in the Governor's Budget Act of _____

Fiscal Year: _____

☐ 2. Additional expenditures in the current State Fiscal Year which are NOT reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

Check reason(s) this regulation is not reimbursable and provide the appropriate information:

☐ a. Implements the Federal mandate contained in _____

☐ b. Implements the court mandate set forth by the _____ Court.

Case of: _____ vs. _____

☐ c. Implements a mandate of the people of this State expressed in their approval of Proposition No. _____

Date of Election: _____

☐ d. Issued only in response to a specific request from affected local entity(s).

Local entity(s) affected: _____

_____

☐ e. Will be fully financed from the fees, revenue, etc. from: _____

Authorized by Section: _____ of the _____ Code;

☐ f. Provides for savings to each affected unit of local government which will, at a minimum, offset any additional costs to each;

☐ g. Creates, eliminates, or changes the penalty for a new crime or infraction contained in _____

☐ 3. Annual Savings. (approximate)

$ _____

☐ 4. No additional costs or savings. This regulation makes only technical, non-substantive or clarifying changes to current law regulations.

☒ 5. No fiscal impact exists. This regulation does not affect any local entity or program.

☐ 6. Other. Explain _____

_____

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT (REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT (CONTINUED)

B. FISCAL EFFECT ON STATE GOVERNMENT *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

It is anticipated that State agencies will:

☐ a. Absorb these additional costs within their existing budgets and resources.

☐ b. Increase the currently authorized budget level for the _____ Fiscal Year

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any State agency or program.

☐ 4. Other. Explain _____

_____

C. FISCAL EFFECT ON FEDERAL FUNDING OF STATE PROGRAMS *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any federally funded State agency or program.

☐ 4. Other. Explain _____

_____

FISCAL OFFICER SIGNATURE	DATE
DocuSigned by: Dan Reagan	3/19/2026

The signature attests that the agency has completed the STD. 399 according to the instructions in SAM sections 6601-6616, and understands the impacts of the proposed rulemaking. State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization.

AGENCY SECRETARY	DATE
Melissa A. Miller-Henson Bryan Cash 3/26/2026	3/18/2026

Finance approval and signature is required when SAM sections 6601-6616 require completion of Fiscal Impact Statement in the STD. 399.

DEPARTMENT OF FINANCE PROGRAM BUDGET MANAGER	DATE

Docusign Envelope ID: 9E376932-80AF-4F2C-A101-D58537033D93

Economic and Fiscal Impact Statement (STD 399)
Addendum

Amend Subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40, Title 14, California Code of Regulations, Regarding Central Valley Sport Fishing

Background

The proposed regulatory amendments of subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 will revise the 2025 sport fishing regulations for Sacramento River fall-run Chinook salmon (SRFC) in the American, Feather, Mokelumne, and Sacramento rivers, respectively, for consistency with Pacific Fishery Management Council (PFMC) in-river harvest projections. Collectively, these four rivers constitute the “Central Valley fishery” for SRFC for the purposes of this document.

The current open fishing seasons for SRFC in the Central Valley are specific to each river and river section and have start and end dates that encompass the migration periods for salmon to upstream spawning habitat in the American, Feather, Sacramento, and Mokelumne rivers. In recent years, low rivers flows, caused by low precipitation, and/or low salmon abundance estimates have forced the California Fish and Game Commission (Commission) to close salmon fishing to protect all salmon populations in the Central Valley. Low river flows can cause adult salmon to delay their upstream migration to spawning habitat and prevent access for salmon to their natal streams. In some years, a complete fishing closure is necessary to minimize fishery impacts during stressful environmental conditions such as low flows and low adult returns. In other years, however, a shortened fishing season may be enough to protect salmon populations. To avoid a complete fishing closure when feasible, the Commission needs the flexibility to annually adjust the SRFC fishing season lengths on the American, Feather, Mokelumne, and Sacramento rivers. Having this flexibility will allow the Commission to provide fishing opportunity while still protecting salmon populations.

The California Department of Fish and Wildlife (Department) recognizes the uncertainty of SRFC in-river harvest projections. Therefore, for the 2026 Central Valley fishery, the Department is presenting four regulatory options for the Commission’s consideration to tailor 2026 Central Valley fishery management to target 2026 in-river fisheries harvest projections. The Commission may adopt these options for each river section independently, or in combination to meet PFMC SRFC management objectives and determine the recreational salmon fishing opportunities in the Central Valley.

- Option 1 is the most liberal of the options and allows take of any size Chinook Salmon up to the daily limit [0-4] and possession limit [0-12].

- Option 2 allows for take of a limited number of adult Chinook Salmon, with grilse Chinook Salmon (two-year old salmon) making up the remainder of the daily bag limit [0-4] and possession limit [0-12].

- Option 3 is a more conservative option and allows for a grilse-only Chinook Salmon fishery up to the daily bag limit [0-4] and possession limit [0-12]. Take of adult Chinook Salmon would not be allowed.

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- Option 4 is the most conservative option and prohibits the take and possession of Chinook Salmon in all anadromous areas of and tributaries to the American, Feather, Mokelumne, and Sacramento rivers. This option prohibits all methods of targeting salmon including catch and release fishing. Unless otherwise noted, this option will allow take of other species.

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the creation of new business or the elimination of existing businesses, because the proposed changes to the regulations are unlikely to be substantial enough to significantly impact the demand for goods and services associated with sport fishing. Sport fishing opportunities for other non-salmonid species would remain in regulation (including for Option 4).

Additionally, the current proposed regulations include provisions for brown trout sportfishing. Non-native brown trout have occasionally been caught in the steelhead trout fishery on the Sacramento River, particularly in the reaches below Keswick Dam. Brown trout are highly piscivorous and are known to prey upon juvenile Chinook Salmon, Coho Salmon and steelhead trout in locations where their presence overlaps, which can suppress native species recovery. The Department is proposing increasing the Brown Trout bag limit to five fish per day with 10 fish in possession. This proposed change will reduce predation on juvenile salmon and steelhead and align these regulations with existing regulations for brown trout in anadromous waters. The proposed regulations add take for Brown Trout to 7.40(b)(80)(B)(1) and (2) and (C). A harvest of 5 brown trout is appropriate given the recent catch and observations by the Department.

Economic Impact Statement

Section A

Question 6. Number of jobs created and eliminated.

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the creation or elimination of jobs. For Option 1, no change in job creation or elimination is anticipated. Option 2, Option 3, and Option 4 have the potential to result in fewer angler visits, and absent substitution toward other sport fish and/or activities in the affected areas the reduction in angler spending could reduce the support for an estimated 0-119 jobs statewide (refer to Section C, question 3 Table 1, below). Additionally, the proposed changes to brown trout angling are expected to benefit anglers by increasing opportunity to fish for them, though it should be noted that brown trout are rarely caught and the expansion of opportunity is not expected to materially increase the demand for guides or bait, lures, or equipment in a way that would create employment opportunities.

Section B

Question 1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime?

$0. The regulations under consideration seek to maintain SRFC sport fishing opportunities with no new compliance costs. The proposed bag and possession limits, body of water, and season length shifts do not prescribe any particular equipment or methods.

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Section C

Question 1. Briefly summarize the benefits of the regulation.

Adopting scientifically-based SRFC bag and possession limits provides for the maintenance of sufficient populations of Chinook salmon to ensure their continued existence.

The benefits of the proposed regulations are consistency with federal fishery management goals, sustainable management of the SRFC fishery, general health and welfare of California residents, and promotion of businesses that rely on sport fishing in the Central Valley.

Question 3. What are the total statewide benefits from this regulation over its lifetime?

The total economic impact of the continued level of activity throughout the Central Valley fishery is reported as the "benefit" of this regulation while the incremental change introduced by this proposed regulation is reported as the "costs." Approximately $14.6 – 29.1 million (2026$) is the total economic impact annually. The 2023 and 2024 seasons were closed to salmon fishing which induced an atypical drop in sportfishing visits, while the previous 2025 season had a partial closure that resulted in approximately 46,646 angler days, which was below the projection for Option 4. The five-year average over the more historically typical 2017-2021 seasons are used for calibrating the historical conditions in which the Central Valley fishery experiences about 174,192 sport salmon angler days where anglers spend an average of $118.84 (2026$) per day, contributing a total of $20.7 million (2026$) in direct expenditures to California businesses. This expenditure is received by area businesses that spend a share on inputs and payroll. As employees receive income, their household spending again circulates in the local economy and statewide. These multiplier effects result in an estimated total economic impact of $29.1 million (2026$), that supports up to 237 jobs throughout the state. However, the impacts of the regulations are measured against the 2025 season.

The proposed amendments to regulations are expected to support fishing within the five-year average historical range such that the difference or "cost" is $0. Options 1, 2, or 3 are expected to sustain fishery activity within the range of the 2017-2021 historically typical seasons. Option 4 is projected to more substantially decrease angler days, resulting in an estimated 50 percent of the average historical level of sport fishing economic stimulus. The proposed regulatory options are presented to the Commission so that a choice may be implemented in order to align with the PFMC status report on Chinook salmon and recommended management limits. There is always the possibility that PFMC could recommend a full closure to salmon fishing. The potential economic impact between the 2025 season, which resulted in approximately 46,646 angler days based on Creel Survey data, and the options under consideration range from $6.8 - $21.3 million (2026$) depending on the option chosen as shown in Table 1.

The regional and statewide economic impacts factor into the effort to balance the maintenance of the sport fishery with resource preservation, while complying with PFMC recommendations. The potential economic impacts that may result from each in-river harvest projection as specified in Option 1, Option 2, Option 3, and Option 4 are evaluated in terms of each scenario's probable impact on the number of angler days, and thus area spending. However, the anticipated economic impacts may vary a bit more or less than the consequences of one single option, as the proposed options may be adopted as a combination of bag and possession limits by body of water so as to minimize adverse impacts to fishing opportunity and economic activity.

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Table 1. Central Valley Fishery Projected Economic Impacts 2026

Regulation	Angler Days	Angler Expenditures	Total Econ Impact	Jobs
Option 1	174,1921[1]	$20,700,221	$29,107,692	237
Option 2	156,773	$18,630,199	$26,196,923	214
Option 3	139,364	$16,560,177	$23,286,154	190
Option 4	87,096[2]	$10,350,111	$14,553,846	119
Year	**Angler Days**	**Angler Expenditures**	**Total Econ Impact**	**Jobs**
2025	46,646	$5,543,208	$7,794,603	64
Regulation	**Angler Day Gains From 2025**	**Expenditure Gains From 2025**	**Total Impact Gain From 2025**	**Job Gains From 2025**
Option 1	127,546	$15,157,013	$21,313,089	174
Option 2	110,127	$13,086,991	$18,402,320	150
Option 3	92,708	$11,016,969	$15,491,551	126
Option 4	40,450	$4,806,902	$6,759,243	55

[1] *Base year used for angler days is the five-year average of 2017–2021 (years with no emergency closure) annual creel survey data.*

[2] *Projected angler days with a salmon closure assumes that 50% of effort will persist as anglers shift or continue to pursue opportunities for other fish species. Sources: California Department of Fish and Wildlife, Fisheries Branch economic analysis; U.S. Fish and Wildlife Service, 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation; expenditure figures are (2026$), adjusted for inflation with Implicit Price Deflator for Personal Consumption Expenditures, Bureau of Economic Analysis.*

Historical correlations between catch limits and fishery participation levels suggest that Option 1 could enable an historically (5-year average) typical number of angler days for the 2026 Chinook Salmon season on the American, Feather, Mokelumne, and Sacramento rivers. Option 2 may result in declines in angler days of 17,419 below a typical year, but still represent an increase of 110,127 angler days from the 2025 season. Option 3 may result in larger declines but with an increase of 92,708 angler days from the previous season. Option 4 is expected to result in a 50 percent decline from the historical average but an increase in 40,450 angler days from 2025. Together, the proposed options represent a potential gain of $6.8 to $21.3 million in total economic activity for the region.

A share (approximately 50% for all options) of anglers are assumed to continue pursuing other in-river sport fish aside from Chinook salmon, such as steelhead (*Oncorhynchus mykiss*), striped bass (*Morone saxatilis*), largemouth bass (*Micropterus salmoides*), sturgeon (*Acipenser transmontanus*) and catfish (*Ictalurus spp.*), and that may mitigate some adverse impacts from any reductions in salmon fishing. Additionally, the proposed regulations to increase the Brown

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Trout bag limit to five fish per day with 10 fish in possession should provide additional opportunities for anglers. In sum, the options presented to the Commission were conceived with the goal of enabling levels of recreational SRFC fishing in the range of historical averages and thus should not be a source of significant adverse economic impacts.

Question 4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation.

The Commission does not anticipate that any of the proposed options would induce substantial impacts on the expansion of businesses currently doing business within the state. The proposed regulations are not anticipated to increase demand for services or products from the existing businesses that serve inland sport anglers. The number of fishing trips and angler economic contributions are expected to remain within the range of historical averages.

Section D

Question 1. Alternatives to the Regulation

The "Regulation" is specified in the initial statement of reasons (ISOR) as ***Option 1*** which would allow anglers to take any size Chinook salmon up to the daily bag limit [0-4] and possession limit [0-12] (most liberal option).

Alternative 1 is specified in the ISOR as ***Option 2*** which would allow for take of a limited number of adult Chinook salmon, with grilse Chinook salmon making up the remainder of the daily bag limit [0-4] and possession limit [0-12].

Alternative 2 is specified in the ISOR as ***Option 3*** which is the more conservative option and allows for take of only grilse Chinook salmon up to the daily bag limit [0-4] and possession limit [0-12]. Take of adult Chinook salmon would not be allowed.

Alternative 3 is specified in the ISOR as ***Option 4*** would prohibit all methods of targeting salmon including catch and release fishing. Unless otherwise noted, this option would allow take of other species.

Question 2. Summarize the total statewide costs and benefits from this regulation and each alternative considered.

Table 2. Regulation and Alternatives Total Statewide Benefits and Costs (2026$)

Regulation or Alternative	Benefit (Millions)	Cost (Millions)
Regulation: Option 1	$21.3	$0
Alternative 1: Option 2	$18.4	$0
Alternative 2: Option 3	$15.5	$0
Alternative 3: Option 4	$6.8	$0

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Fiscal Impact Statement

A. Fiscal Effect on Local Government

Answer 5. No fiscal impact exists. This regulation does not affect any local entity or program. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution.

B. Fiscal Effect on State Government

Answer 3. No fiscal impact exists. This regulation does not affect any State agency or program. The Commission does not anticipate additional Department costs to oversee inland sport fishing in the affected areas over what is currently in place.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Signed Original on File
Received April 30, 2026

MEMORANDUM

Date: April 29, 2026

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

From: Meghan Hertel, Director

Subject: Submittal of Pre-Adoption Statement of Reasons to Amend Section 7.40, Title 14, California Code of Regulations, Re: Central Valley Sport Fishing Regulations 2026

Please find attached the Pre-Adoption Statement of Reasons (PSOR) for the 2026 Central Valley sport fishing regulations. The PSOR includes the California Department of Fish and Wildlife's (Department) recommendation of Option 1 from the Initial Statement of Reasons which allows for take and possession of any size Chinook Salmon up to the daily bag and possession limits. The Department recommended a daily bag limit of two fish and a possession limit of four fish for the lower American River, Feather, Mokelumne, and Sacramento rivers. The Department's recommendation will be presented for potential adoption during the California Fish and Game Commission meeting on May 6, 2026.

If you have any questions or need additional information, please contact Jay Rowan, Chief, Fisheries Branch at Fisheries@wildlife.ca.gov.

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

Chad Dibble, Deputy Director
Wildlife and Fisheries Division

Jay Rowan, Branch Chief
Fisheries Branch
Wildlife and Fisheries Division

Tina Bartlett, Regional Manager
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Emily McKim, Senior Regulatory Scientist
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Wildlife and Fisheries Division

Fish and Game Commission

David Thesell,
Deputy Executive Director

Ari Cornman,
Wildlife Advisor

David Haug,
Analyst

State of California
Fish and Game Commission
Pre-Adoption Statement of Reasons for Regulatory Action

Amend Subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40
Title 14, California Code of Regulations
Re: Central Valley Sport Fishing 2026

I. Date of Initial Statement of Reasons: December 20, 2025

II. Date of Pre-Adoption Statement of Reasons: April 17, 2026

III. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: February 12, 2026 Location: Sacramento

(b) Discussion Hearing

Date: April 16, 2026 Location: Sacramento

(c) Adoption Hearing

Date: May 6, 2026 Location: Goleta

IV. Description of Modification of Originally Proposed Language of Initial Statement of Reasons (ISOR)

At the April 16, 2026, California Fish and Game Commission (Commission) meeting, the California Department of Fish and Wildlife (Department) recommended Option 1 from the Initial Statement of Reasons (ISOR) which allows for take and possession of any size Chinook Salmon up to the daily bag and possession limits. The Department recommended a daily bag limit of two fish and a possession limit of four fish for the lower American River, Feather, Mokelumne, and Sacramento rivers. No changes have been made to the originally proposed regulatory language and outlined in the ISOR. The Department's recommendation is slated for adoption at the Commission's May 6, 2026 meeting.

V. Reasons for Modification of Originally Proposed Language of ISOR:

The Pacific Fishery Management Council (PFMC) has reviewed west-coast salmon stocks and has projected the in-river recreational harvest target to be approximately 35,808 adult Sacramento River fall-run Chinook Salmon for the 2026 season. Regulatory options 1-4 in the ISOR encompassed varying ranges of sport fishing bag and possession limits based on PFMC's projection. To target PFMC's projection, the Department is recommending Option 1 in the ISOR, which allows for take of any size Chinook Salmon up to the daily bag possession limits. The Department is not recommending Option 2 (limited adult, and grilse fishery – jacks or jills), Option 3 (grilse-only fishery), or Option 4 (closed fishery).

VI. Summary of Primary Considerations Raised in Opposition and in Support

Comment

March 25, 2026 – Tyler Breitbarth (written comment).

The Commenter supports Option 1 and 2 for the Central Valley Sportfishing regulations. They support Option 1 if in-river abundance shows a large abundance of salmon above the escapement needs and Option 2 with a 4 fish limit, but only 1 “over” the 27” proposed size limit if the in-river abundance is a little tighter to the necessary escapement goals. Immature salmon less than 27” do not reproduce naturally in the river, as well as once received in the hatchery’s they are killed immediately unspawned. Immature salmon do not impact the livelihood of the salmon population for their respective returning years. By opening the fishery under option 2 with such guidelines for size/limit, it would greatly improve angler opportunity while still protecting the bulk majority of spawning salmon needed for offspring production.

Response:

The PFMC has established a recreational harvest target of 35,808 adult Sacramento River fall-run Chinook Salmon in the Sacramento River system for 2026. This has prompted the Department to recommend an open salmon fishery in 2026 with no restrictions. At the April 16, 2026 Commission meeting, the Department recommended Option 1 from the ISOR which allows for take and possession of any size Chinook Salmon up to the daily bag and possession limits. The Department recommended a daily bag limit of two fish and a possession limit of four fish for the lower American River, Feather, Mokelumne, and Sacramento rivers.

Comment

April 16, 2026 – James Stone, President of the Northern California Guides and Sportsmen’s Association (NCGASA) (verbal comment).

The Commenter supports the Department’s recommendations.

Response:

Comments noted and appreciated.

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 prescribe the 2025 seasons and daily bag and possession limits for Sacramento River fall-run Chinook salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Collectively, these four rivers constitute the "Central Valley fishery" for SRFC for purposes of this document. Each year, the Department recommends new Chinook Salmon bag and possession limits for consideration by the Commission to align the fishing limits with up-to-date management goals, as set forth below.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of recreational and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The PFMC will develop the annual Pacific coast ocean salmon fisheries regulatory options for public review at its March 2026 meeting and will adopt its final regulatory recommendations at its April 2026 meeting based on the PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season. Based on the April 2026 recommendation by PFMC, the Department will recommend specific seasons and bag and possession limit regulations to the Commission at its April 16, 2026, meeting. The Commission will then consider adoption of the Central Valley sport fishing regulations at its May 6, 2026, meeting.

Proposed Regulations

Chinook Salmon Bag and Possession Limits

The Department recognizes the uncertainty of SRFC in-river harvest projections. Therefore, for the 2026 Central Valley fishery, the Department is presenting four regulatory options for the Commission's consideration to tailor 2026 Central Valley fishery management to target 2026 in-river fisheries harvest projections. The Commission may adopt these options for each river section independently, or in combination to meet PFMC SRFC management objectives.

- American River, subsections 7.40(b)(4)(B), (C) and (D).
- Feather River, subsection 7.40(b)(43)(D), (E), and (F).
- Mokelumne River, subsection 7.40(b)(66)(A), (B) and (D).
- Sacramento River below Keswick Dam, subsection 7.40(b)(80)(C), (D) and (E).

The following options are provided for Commission consideration:

Option 1 – Any Size Chinook Salmon Fishery

This option is the Department's preferred option if the 2026 SRFC stock abundance forecast is sufficiently high to avoid the need to constrain in-river SRFC harvest.

Bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

Option 2 – Limited Adult and Grilse Salmon Fishery

Bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0–12] fish may be over 27 inches total length.

Option 3 – Grilse Salmon Fishery Only

Bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Option 4 – No Salmon Fishing in all Central Valley Rivers, Streams, and Tributaries

No take or possession of Chinook Salmon.

Chinook Salmon Fishing Seasons

The current open fishing seasons for SRFC in the Central Valley are specific to each river and river section and have start and end dates that encompass the migration periods for salmon to upstream spawning habitat in the American, Feather, Sacramento, and Mokelumne rivers. To provide angling opportunity while minimizing the risk of overharvest due to uncertainty of SRFC in-river harvest projections, the Department is presenting a range of dates within that historic range that spans the open fishing season specific to each river section. This will provide the Commission with the flexibility to start the season later or end the season earlier, per section of river or across the valley.

Separate Chinook Salmon Seasons from other Sport Fish Species Seasons

Under existing regulations, the open fishing seasons for Chinook Salmon in the Central Valley are presented in the same row in the regulatory text table as other sport fish species including steelhead trout, Striped Bass, and Shad. The Department's recent change of the Chinook Salmon fishing seasons from a static, uniform date range to a range of dates does not apply to other sportfish species. The existing fishing seasons for other sportfish species will remain unchanged. Therefore, it is necessary to uncouple the fishing seasons for these distinct fisheries throughout the regulatory text. The separated seasons are indicated in the Proposed Regulatory Language by having Chinook Salmon in a separate row in the table from the other sport fish species including hatchery steelhead and hatchery trout. This change does not alter the season for non-Chinook Salmon sport fish opportunities but rather combines and consolidates the season into one row in the table.

Brown Trout Harvest Opportunity in Sections of the Sacramento River

Non-native Brown Trout have occasionally been caught in the steelhead trout fishery on the Sacramento River, particularly in the reaches below Keswick Dam. Brown Trout are highly piscivorous and are known to prey upon juvenile Chinook Salmon, Coho Salmon and steelhead trout in locations where their presence overlaps, which can suppress native species recovery. The Department is proposing to allow the harvest of Brown Trout in the Sacramento River. This proposed change will reduce predation on juvenile salmon and steelhead and align these regulations with existing regulations for Brown Trout in anadromous waters. The proposed regulations add take for Brown Trout to Section 7.40, subsections (b)(80)(B)(1) and (2) and (C) with a bag limit of 5 fish per day and 10 fish in possession. A harvest of 5 Brown Trout is appropriate given the recent catch and observations reported to the Department.

Benefits of the Proposed Regulations

The Commission anticipates benefits to the environment in the sustainable management of Central Valley Chinook Salmon resources. Other benefits of the proposed regulations are consistency with federal fishery management goals, and health and welfare of California residents.

Consistency and Compatibility with Existing Regulations

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated to the Commission the power to regulate sport fishing in waters of the state (Fish and Game Code sections 200, 205, 315 and 316.5). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulations. The Commission has searched the California Code of Regulations and finds no other state agency regulations pertaining to Chinook Salmon sport fishing seasons, bag, and possession limits for Central Valley sport fishing.

Update

No changes have been made to the originally proposed regulatory language; however, at the April 16, 2026, Commission meeting, the Department recommended Option 1 from the Initial Statement of Reasons which allows for take and possession of any size Chinook Salmon up to the daily bag and possession limits. The Department recommended a daily bag limit of two fish and a possession limit of four fish for the lower American River, Feather, Mokelumne, and Sacramento rivers.

Proposed Regulatory Language

Section 7.40, Title 14, CCR, is amended to read:

§ 7.40. Alphabetical List of Hatchery Trout, Hatchery Steelhead, and Salmon Waters with Special Fishing Regulations.

. . . [No changes to subsections (a) through (b)(3)]...

Note: Shading in grey shows the consolidation of the hatchery trout or hatchery steelhead seasons.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(4) American River (Sacramento Co.).		
(A) From Nimbus Dam to the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site.	Closed to all fishing all year.	
(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.	Jan. 1 through ~~Jul. 15~~Oct. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Oct. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 15 for Chinook Salmon.~~ [Jul. 16 – Oct. 31] through [Jul.16 – Oct. 31]. Only barbless hooks may be used.	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		[0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 31] through [Jul.16 – Dec. 31].	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(D) From the Jibboom Street bridge to the mouth.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon~~ [Jul. 16 – Dec. 16] through [Jul.16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(5) through (b)(42)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(43) Feather River below Fish Barrier Dam (Butte, Sutter and Yuba cos.).		

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(A) From Fish Barrier Dam to Table Mountain bicycle bridge in Oroville.	Closed to all fishing all year.	
(B) From Table Mountain bicycle bridge to Highway 70 bridge.	Jan. 1 through Jul. 15. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
(C) From Highway 70 bridge to the unimproved boat ramp above the Thermalito Afterbay Outfall.	All year.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Oct. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Sept. 15 for Chinook Salmon.~~ [Jul. 16 – Oct. 31] through [Jul.16 – Oct. 31].	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Nov. 1 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 to Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~
(F) From the Highway 99 bridge to the mouth. For purposes of this subsection, the lower boundary is defined as	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~ [Jul. 16 – Dec.16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 to Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(44) through (b)(65)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(66) Mokelumne River (San Joaquin Co.).		
(A) From Camanche Dam to Elliot Road.	Jan. 1 through Mar. 31.	1 hatchery trout or hatchery steelhead**.
	Fourth Sat. in May through ~~Jul.15~~ Oct. 15.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Oct. 15 for hatchery trout or hatchery steelhead.~~	~~1 hatchery trout or hatchery steelhead**.~~

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	~~Jul. 16 through Sept. 15 for Chinook Salmon.~~ [Jul. 16 – Oct.15] through [Jul. 16 – Oct. 15].	~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(B) From Elliot Road to the Woodbridge Irrigation District Dam including Lodi Lake.	Jan. 1 through ~~Jul. 15~~Dec. 31.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 15 for Chinook Salmon.~~ [Jul. 16 – Dec. 31] through [Jul. 16 – Dec. 31].	~~1 hatchery trout or hatchery steelhead**.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		Option 3: [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(C) Between the Woodbridge Irrigation District Dam and the Lower Sacramento Road bridge.	Closed to all fishing all year.	
(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.	Jan. 1 through ~~Jul. 15~~Dec. 31.	1 hatchery trout or hatchery steelhead**.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Oct. 31 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~1 hatchery trout or hatchery steelhead**.~~ ~~1 Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	~~Dec. 17 through Dec. 31.~~	~~1 hatchery trout or hatchery steelhead**.~~

. . . [No changes to subsections (b)(67) through (b)(79)]. . .

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(80) Sacramento River and tributaries below Keswick Dam (Butte, Colusa, Contra Costa, Glenn, Sacramento, Shasta, Solano, Sutter, Tehama, and Yolo Cos.).		
(A) Sacramento River from Keswick Dam to 650 feet below Keswick Dam.	Closed to all fishing all year.	
(B) Sacramento River from 650 feet below Keswick Dam to the Highway 44 bridge.		
1. Sacramento River from 650 feet below Keswick Dam to the Highway 44 bridge.	Jan 1. through Mar. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. <u>5 Brown Trout.</u> <u>10 Brown Trout in possession.</u>
	Closed to all fishing from Apr. 1 through Jul. 31.	
	Aug 1. through Dec. 31. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. <u>5 Brown trout.</u> <u>10 Brown trout in possession.</u>
2. Sacramento River from the Highway 44 bridge to the Deschutes Road bridge.	All year. Only barbless hooks may be used.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. <u>5 Brown Trout.</u> <u>10 Brown Trout in possession</u>.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.	Jan. 1 through ~~Jul. 31~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession. 5 Brown Trout. 10 Brown Trout in possession.
	~~Aug. 1 through Oct 31 for hatchery trout or hatchery steelhead.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~
	~~Aug 1. through Oct. 31 for Chinook Salmon.~~ [Aug. 1 – Oct. 31] through [Aug. 1 – Oct. 31].	~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	~~Nov. 1 through Dec. 31 for hatchery trout or hatchery steelhead.~~ ~~Nov. 1 through Dec. 31 for Chinook Salmon.~~ [Nov. 1 – Dec. 31] through [Nov. 1 – Dec.31].	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~ ~~Closed to the take and possession of Chinook Salmon.~~

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
	[Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16].	**Option 1:** [0-4] Chinook Salmon. [0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~
(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).	Jan. 1 through ~~Jul. 15~~Dec. 31.	2 hatchery trout or hatchery steelhead**. 4 hatchery trout or hatchery steelhead** in possession.
	~~Jul. 16 through Dec. 16 for hatchery trout or hatchery steelhead.~~ ~~Jul. 16 through Dec. 16 for Chinook Salmon.~~ [Jul. 16 – Dec. 16] through [Jul. 16 – Dec. 16]	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession~~. ~~Closed to the take and possession of Chinook Salmon.~~ **Option 1:** [0-4] Chinook Salmon

Body of Water	*Open Season and Special Restrictions*	*Daily Bag and Possession Limit*
		[0-12] Chinook Salmon in possession. **Option 2:** [0-4] Chinook Salmon – no more than [0-4] salmon over 27 inches total length. [0-12] Chinook Salmon in possession of which no more than [0-12] salmon may be over 27 inches total length. **Option 3:** [0-4] Chinook Salmon. Maximum size 27 inches total length. [0-12] Chinook Salmon in possession. Maximum size 27 inches total length. **Option 4:** Closed to the take and possession of Chinook Salmon.
	~~Dec. 17 through Dec. 31.~~	~~2 hatchery trout or hatchery steelhead**.~~ ~~4 hatchery trout or hatchery steelhead** in possession.~~

. . . [No changes to subsections (b)(81) through (b)(123)]. . .

* Wild Chinook Salmon are those not showing a healed adipose fin clip and not showing a healed left ventral fin clip.

**Hatchery trout or steelhead in anadromous waters are those showing a healed adipose fin clip (adipose fin is absent). Unless otherwise provided, all other trout and steelhead must be immediately released. Wild trout or steelhead are those not showing a healed adipose fin clip (adipose fin is present).

NOTE: Authority cited: Sections 200, 205, 265, 270, 315, 316.5, 399 and 2084, Fish and Game Code. Reference: Sections 200, 205, 265, 270, 316.5 and 2084, Fish and Game Code.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Signed Original on File
Received March 16, 2026

MEMORANDUM

Date: March 12, 2026

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

From: Meghan Hertel, Director

Subject: **Initial Study and Negative Declaration for Proposed Amendments to Central Valley Sport Fishing Regulations, Subsections (b)(4), (b)(43), (b)(66), and (b)(80)) of Section 7.40, Title 14, California Code of Regulations**

In compliance with the California Environmental Quality Act, the Department of Fish and Wildlife (Department) has prepared the enclosed *Initial Study and Negative Declaration for Proposed Amendments to the 2026 Central Valley Basin Sport Fishing Regulations, Title 14, California Code of Regulations (CCR)* for review and consideration by the California Fish and Game Commission (Commission).

The Commission proposes to amend the Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing regulations as set forth in Title 14, California Code of Regulations (Project). Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 establish the season dates and daily bag and possession limits for SRFC sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Each year the Department evaluates the potential need to amend the existing SRFC bag and possession limits to align with management goals. Based on the 2026 initial study, the Project will not have any significant or potentially significant effects on the environment. There is no substantial evidence, in light of the whole record before the Commission, that the Project may have a significant effect on the environment. The Department recommends the Commission adopt the Negative Declaration.

If you have any questions regarding the enclosed documents, please contact Karen Mitchell, Senior Environmental Scientist, at inlandfisheriesreg@wildlife.ca.gov.

ec:

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California Fish and Game Commission

Draft Negative Declaration

for

Proposed Amendments
2026 Central Valley Sport Fishing Regulations

Subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40
Title 14, California Code of Regulations

Prepared by:

California Department of Fish and Wildlife
Fisheries Branch

January 2026

This report has been prepared pursuant to the
California Environmental Quality Act of 1970

State Clearinghouse #2026040456

Project Summary and Findings

The Project

The California Fish and Game Commission (Commission) proposes to amend the Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing regulations as set forth in Title 14,California Code of Regulations. Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 establish the season dates and daily bag and possession limits for SRFC sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Each year the California Department of Fish and Wildlife (Department) evaluates the potential need to amend the existing SRFC bag and possession limits to align with management goals. Any proposed changes to the salmon fishing regulations are presented to the Commission for consideration.

The Findings

The Commission finds that the Project would not have a significant effect on the environment.

The completed Initial Study, attached to this Negative Declaration, documents the basis for this finding and the Commission's determination that that the Project will not have any significant or potentially significant effects on the environment, and that there is no substantial evidence, in light of the whole record before the Commission, that the Project may have a significant effect on the environment. Therefore, no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment.

The Initial Study concluded that the Project will not have a significant effect on aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

Therefore, this Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21080, subdivision (c).

Basis of the Findings

This Negative Declaration consists of:

- Project Description and Background Information on the Proposed Amendments to Central Valley Sport Fishing Regulations
- Initial Study Environmental Checklist Form
- Explanation of the Responses to the Initial Study Environmental Checklist Form

Project Description and Background Information
for
Proposed Amendments
to
Central Valley Sport Fishing Regulations
Title 14, California Code of Regulations

Annually, the Department recommends Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing regulations for the American, Feather, Mokelumne, and Sacramento rivers to the Commission. The Commission then makes the final determination on what amendments to the regulations should be implemented and is the lead agency for the purposes of CEQA. Under California Fish and Game Code Section 200, the Commission has the authority to regulate the taking or possession of fish for the purpose of sport fishing.

Project Goals and Objectives

The goal of this project is to amend the SRFC sport fishing regulations in furtherance of the state's policy on conservation, maintenance, and utilization of California's aquatic resources stated in Fish and Game Code Section 1700. This section includes three objectives:

1. Maintain sufficient populations of all aquatic species to ensure their continued existence.
2. Maintain sufficient resources to support a reasonable sport use.
3. Management of fisheries using best available science and public input.

Background

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of recreational and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the U.S. Secretary of Commerce, the recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

PFMC will adopt its final regulatory recommendations at its April 2026 meeting based on the PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season. Based on the April 2026 recommendation by PFMC, the Department will recommend specific bag and possession limits to the Commission at its April 15-16, 2026 meeting. The Commission will then consider adopting the Central Valley sport fishing regulations at its May 6, 2026 meeting.

Project Location

The sport fishing addressed by this environmental document occurs in the waters of the American, Feather, Mokelumne, and Sacramento rivers in northern and central California in the counties of Siskiyou, Shasta, Tehama, Colusa, Butte, Yuba, Sutter, Placer, El Dorado, Sacramento, Yolo, Solano, Contra Costa, and San Joaquin.

Environmental Setting

In 1945, the Commission was charged with promulgating regulations to manage sport fishing in California, which includes a SRFC sport fishery on the American, Feather, Mokelumne, and Sacramento rivers. Since then, the SRFC sport fishery on these rivers has been open every year, with the exception of fishing closures in 2008-2009 and 2023-24. In May 2025, the Commission adopted the Department's recommendation to close the SRFC fishery on the Sacramento River and to restrict the SRFC fishery on the American, Feather, and Mokelumne rivers for the 2025 season. This relatively conservative approach for these waters was informed by the Department's concern regarding low adult returns to the upper Sacramento River in recent years and the continued rebuilding of the SRFC stock in the Sacramento River basin.

Although the SRFC in-river sport fishery was constrained in 2025, the Project area is open to fishing for other sport fisheries including, but not limited to, black bass, catfish, White Sturgeon, Striped Bass, American Shad, and Rainbow Trout. The recent lull in the SRFC in-river sport fishery is abnormal and does not accurately represent the environmental baseline for the Project. The conditions that do accurately represent the environmental baseline for the Project are an open SRFC in-river sport fishery between July and December with an amount of allowable take within the range of take allowed for the Project area between 2017 and 2021. This particular period of time also represents the norm for the environmental setting as assessed in federal and state economic and fiscal analyses of the effects of possible changes to the fishery.

Project Description

Current regulations in subsections (b)(4), (b)(43), (b)(66), and (b)(80) of Section 7.40 prescribe the seasons and daily bag and possession limits for Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively (**Figure 1**). Each year, the Department recommends new SRFC bag and possession limits for consideration by the Commission to align the fishing limits with up-to-date management goals, as set forth below.

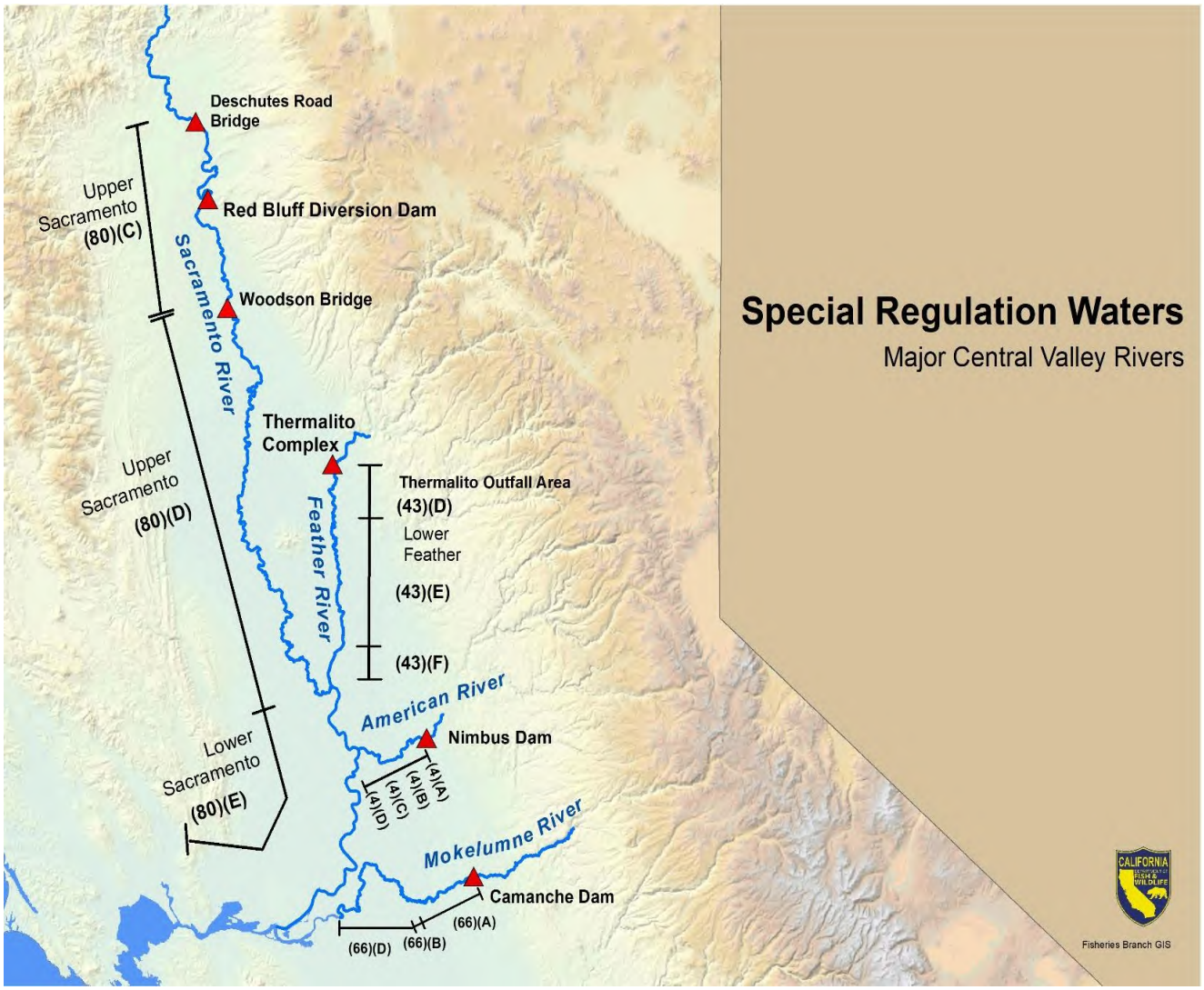


Figure 1. Map of the SRFC sport fishery encompassing the following rivers and their respective subsections of Section 7.40: American (b)(4), Feather (b)(43), Mokelumne (b)(66), and Sacramento (b)(80).

Schedule

If adopted by the Commission and approved by the Office of Administrative Law, the proposed regulatory amendments will become effective on or around July 15, 2026.

Proposed Regulations

Chinook Salmon Open Fishing Seasons

The current open fishing seasons for SRFC in the Central Valley are specific to each river and river section and have start and end dates that encompass the migration periods for salmon to upstream spawning habitat in the American, Feather, Sacramento, and Mokelumne rivers. In recent years, low rivers flows, caused by low precipitation, and/or low salmon abundance estimates have forced the Commission to close salmon fishing to protect all salmon populations in the Central Valley. Low river flows can cause adult salmon to delay their upstream migration to spawning habitat and prevent access for salmon to their natal streams. In some years, a complete fishing closure is necessary to minimize fishery impacts during stressful environmental conditions, such as low flows, and low adult returns. In other years, however, a shortened fishing season may be enough to protect salmon populations in the Central Valley. To avoid a complete fishing closure when feasible, the Commission needs the

flexibility to annually adjust the SRFC fishing season lengths on the American, Feather, Mokelumne, and Sacramento rivers.

To address this, annually, the Department proposes a range of dates encompassed within the historical open fishing season window (e.g., July 16 through Dec 31) specific to each river section. As done with bag and possession limits, the Department will recommend river section-specific seasons based on salmon abundance estimates and recommendations for ocean harvest for the coming season determined by PFMC at its April 2026 meeting. Having this flexibility allows the Department to provide fishing opportunities while still protecting salmon populations.

Chinook Salmon Bag and Possession Limits

The Department recognizes the uncertainty of SRFC in-river harvest projections. Therefore, the Department is presenting four regulatory options for the Commission's consideration to tailor 2026 Central Valley fishery management to target 2026 in-river fisheries harvest projections. The Commission may adopt these options for each river section independently, or in combination to meet PFMC SRFC management objectives and determine the recreational salmon fishing opportunities in the Central Valley.

Option 1: The most liberal of the options, allows take of any size Chinook Salmon up to the daily bag and possession limits.

Option 2: Allows for take of a limited number of adult Chinook Salmon, with grilse Chinook Salmon (two-year old salmon) making up the remainder of the daily bag and possession limits.

Option 3: Allows for a grilse-only Chinook Salmon fishery.

Option 4: The most conservative option, prohibits the take and possession of Chinook Salmon in all anadromous areas of and tributaries to the American, Feather, Mokelumne, and Sacramento rivers.

Key to Proposed Regulatory Changes

Because the PFMC recommendations are not known at this time, a range of bag and possession limits shown in [brackets] is indicated in the text below where it is desirable to continue Chinook Salmon fishing in the American, Feather, Mokelumne, and Sacramento rivers. **Additionally, the respective fishing season date range is indicated in [brackets] to allow for the ability to start the season later or end the season earlier, per section of river or across the valley.**

Option 1 – Any Size Chinook Salmon Fishery

This option would allow anglers to take up to [0-4] Chinook Salmon of any size per day and have [0-12] Chinook Salmon in possession. This option is the Department's preferred option if the 2026 SRFC stock abundance forecast is sufficiently high to avoid the need to constrain in-river SRFC harvest.

American River, subsection 7.40(b)(4):

(B) From the United States Geological Survey (USGS) gauging station cable crossing

about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

(E) From 200 yards above the Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Mokelumne River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi

Lake.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon.

Possession limit – [0-12] Chinook Salmon.

Option 2 – Limited Adult and Grilse Salmon Fishery

This option would allow the take of a limited number of adult Chinook Salmon, with grilse Chinook Salmon (two-year old salmon) making up the remainder of the daily bag and possession limits. This option would allow anglers to take up to [0-4] Chinook Salmon per day, with no more than [0-4] of those salmon over 27 inches total length, and have [0-12] Chinook Salmon in possession, of which no more than [0-12] salmon may be over 27 inches total length. Should a reduction in the adult component of the stock be indicated by PFMC harvest projections, the Department recommends specifying angling opportunities on the smaller, and possibly more numerous grilse salmon to increase angling harvest opportunities. Grilse returns from the previous

season are included in pre-season stock abundance forecasts but are not included in the current season adult returns used for evaluating conservation targets for SRFC. Due to their smaller size, grilse are typically outcompeted by larger adults, and contribute significantly less to the spawning population. As a result, grilse would be available for harvest with minimal impact to juvenile recruitment for the current season. Take of adult salmon would be limited under regulation, and the subsequent juvenile production would help rebuild the depressed stock size at a time when there is the need to restrict harvest of adult salmon.

The Department recommends a grilse salmon size limit of less than or equal to 27 inches total length based on an analysis of grilse data conducted by Department staff in 2018. A 27-inch total length grilse salmon cutoff is the best balance between angling harvest opportunity of possibly abundant smaller, two-year old male salmon and preserving the limited number of females available to spawn.

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0–12] fish may be over 27 inches total length.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which not more than [0-12] fish my be over 27 inches total length.

Mokelumne River, subsection 7.40(b)(66)

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit – [0-12] Chinook Salmon of which no more than [0-12] fish may be over 27 inches total length.

Option 3 – Grilse-only Salmon Fishery

This option would allow for a grilse-only salmon fishery. This option would allow anglers to take [0-4] Chinook Salmon with a maximum size of 27 inches total length and have [0-12] Chinook Salmon in possession, with a maximum size of 27 inches total length. Should a reduction in the adult component of the stock be indicated by PFMC harvest projections, the Department recommends specifying angling opportunities on the smaller, and possibly more numerous grilse salmon to increase angling harvest opportunities. Grilse returns from the previous season are included in pre-season stock abundance forecasts but are not included in the current season adult returns used for evaluating conservation targets for SRFC. Due to their smaller size, grilse are typically outcompeted by larger adults and contribute significantly less to the spawning population. As a result, grilse would be available for harvest with minimal impact to juvenile recruitment for the current season. Take of adult salmon would be prohibited under regulation, and the subsequent juvenile production would help rebuild the depressed stock size at a time when there is the need to restrict harvest of adult salmon.

The Department recommends a grilse salmon size limit of less than or equal to 27 inches total length based on an analysis of grilse data conducted by Department staff in 2018. A 27-inch total length grilse salmon cutoff is the best balance between angling harvest opportunity of possibly abundant smaller, two-year old male salmon and preserving the limited number of female salmon available to spawn.

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

[July 16 – October 31] through [July 16 – October 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) From the Jibboom Street bridge to the mouth.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

[July 16 – October 31] through [July 16 – October 31] with a daily bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit – [0-12] Chinook Salmon less than or equal to 27 inches total length.

Mokelumne River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

[July 16 – October 15] through [July 16 – October 15] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

[July 16 – December 31] through [July 16 – December 31] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

[August 1 – October 31] through [August 1 – October 31], and [November 1 – December 31] through [November 1 – December 31], with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the

Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

[July 16 – December 16] through [July 16 – December 16] with a bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

Option 4 – No Salmon Fishing in all Central Valley Rivers, Streams, and Tributaries

This option would close salmon fishing in the American, Feather, Mokelumne, and/or Sacramento rivers, and all associated tributaries, or specific areas/bodies of water, as specified by river reach(es) in subsection 7.40(b) to provide protection to SRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure to ocean recreational salmon fishing, this option will give the Department flexibility to respond to and support any federal action in the ocean. This option prohibits all methods of targeting salmon including catch and release fishing. Unless otherwise noted, this option would still allow take of other species in specific areas/bodies of water, as specified by river reach(es) in subsection 7.40(b) (See Section VII below).

American River, subsection 7.40(b)(4):

(B) From the U.S. Geological Survey gauging station cable crossing about 300 yards downstream from the Nimbus Hatchery fish rack site to the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park.

July 16 through October 31. No take or possession of Chinook Salmon.

(C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park downstream to the Jibboom Street bridge.

July 16 through December 31. No take or possession of Chinook Salmon.

(D) From the Jibboom Street bridge to the mouth.

July 16 through December 16. No take or possession of Chinook Salmon.

Feather River, subsection 7.40(b)(43):

(D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp.

July 16 through October 31. No take or possession of Chinook Salmon.

(E) From 200 yards above Live Oak boat ramp to the Highway 99 bridge.

July 16 through December 16. No take or possession of Chinook Salmon.

(F) From the Highway 99 bridge to the mouth. For purposes of this regulation, the lower boundary is defined as a straight line drawn from the peninsula point on the west bank to the Verona Marina boat ramp.

July 16 through December 16. No take or possession of Chinook Salmon. Mokelumne

River, subsection 7.40(b)(66):

(A) From Camanche Dam to Elliott Road.

July 16 through October 15. No take or possession of Chinook Salmon.

(B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake.

From July 16 through December 31. No take or possession of Chinook Salmon.

(D) From the Lower Sacramento Road bridge to the mouth. For purposes of this subsection, this river segment is defined as Mokelumne River and its tributary sloughs downstream of the Lower Sacramento Road bridge and east of Highway 160 and north of Highway 12.

From July 16 through December 16. No take or possession of Chinook Salmon.

Sacramento River and tributaries below Keswick Dam, subsection 7.40(b)(80):

(C) Sacramento River from the Deschutes Road bridge to Woodson Bridge.

August 1 through October 31, and November 1 through December 31. No take or possession of Chinook Salmon.

(D) Sacramento River from Woodson Bridge to the Highway 113 bridge near Knights Landing.

July 16 through December 16. No take or possession of Chinook Salmon.

(E) Sacramento River from the Highway 113 bridge near Knights Landing to the Carquinez Bridge (includes Suisun Bay, Grizzly Bay and all tributary sloughs west of Highway 160).

July 16 through December 16. No take or possession of Chinook Salmon.

Brown Trout Harvest Opportunity in Sections of the Sacramento River

Non-native Brown Trout have occasionally been caught in the steelhead trout fishery on the Sacramento River, particularly in the reaches below Keswick Dam. Brown Trout are highly piscivorous and are known to prey upon juvenile Chinook Salmon, Coho Salmon, and steelhead trout in locations where their presence overlaps, which can suppress native species recovery. The Commission proposes to allow the harvest of Brown Trout in the Sacramento River. This proposed change will reduce predation on juvenile salmon and steelhead and align these regulations with existing regulations for Brown Trout in anadromous waters. The proposed regulations add take for Brown Trout to Section 7.40, subsections (b)(80)(B)(1) and (2) and (C) with a bag limit of 5 fish per day and 10 fish in possession. A harvest of 5 Brown Trout is appropriate given the recent catch and observations by the Department.

Initial Study Environmental Checklist Form

1. Project Title: Proposed Amendments to 2026 Central Valley Sport Fishing Regulations, Title 14, California Code of Regulations

2. Lead Agency Name and Address:
   California Fish and Game Commission
   715 P Street, 16th floor
   Sacramento, CA 95814

3. Contact Person and Phone Number: Melissa Miller-Henson, (916) 653-4899

4. Project Location: The American, Feather, Mokelumne, and Sacramento rivers.

5. Project Sponsor's Name and Address:
   California Department of Fish and Wildlife
   Fisheries Branch
   1010 Riverside Parkway
   West Sacramento, CA 95605

6. General Plan designation: N/A (statewide)

7. Zoning: N/A (statewide)

8. Description of Project: Potentially amend the daily bag and possession limits for the Central Valley Chinook Salmon sport fishery to further the state's policy on conservation, maintenance, and utilization of California's aquatic resources as stated in Fish and Game Code Section 1700.

9. Surrounding land uses and setting: N/A

10. Other Public Agencies Whose Approval Is Required: None.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.31?
    No.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/ Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems		
☐ Wildfire		
☐ Mandatory Findings of Significance		

This project will not have a “Potential Significant Impact” on any of the environmental factors listed above; therefore, no boxes are checked.

DETERMINATION

The Commission subjected the draft Initial Study and Negative Declaration to its own review and analysis. Based on that review and analysis, the draft reflects the independent judgment of the Commission and fulfills the Commission’s responsibilities. On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Melissa Miller-Henson, Executive Director — **April 6, 2026** **Date**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	NI
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	NI
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	NI
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	NI
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	NI
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	NI
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	NI
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	NI
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	NI
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	NI
d) Result in any other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	LTS	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	NI
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	NI
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	NI
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	NI
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	NI
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	NI
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	NI
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	NI
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	NI
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	NI
ii) Strong seismic ground shaking?	☐	☐	☐	NI
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	NI
iv) Landslides?	☐	☐	☐	NI
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	NI
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	NI
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	NI
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	NI
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	NI
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	NI
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	NI
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	NI
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	NI
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	NI
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	NI
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	NI
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	NI
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	NI
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	NI
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	NI
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollution runoff; or	☐	☐	☐	NI
iv) impede or redirect flood flows?	☐	☐	☐	NI
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	NI
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	NI
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	NI
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	NI
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
value to the region and the residents of the state?				
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	NI
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	NI
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	NI
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	NI
XIV. POPULATION AND HOUSING.				
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	NI
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	NI
Police protection?	☐	☐	☐	NI
Schools?	☐	☐	☐	NI
Parks?	☐	☐	☐	NI
Other public facilities?	☐	☐	☐	NI
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	NI
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	NI
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	NI
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	NI
d) Result in inadequate emergency access?	☐	☐	☐	NI
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	NI
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	NI
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	NI
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	NI
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	NI
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	NI
XX WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	NI
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	NI
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact	No Impact (NI)
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	NI
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	NI
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	NI
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	NI

Explanation of Responses to Initial Study Environmental Checklist

I. Aesthetics

a) The project will not have an adverse effect on a scenic vista. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.

b) The project will not damage scenic resources such as trees, rock outcroppings, and historic buildings. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.

c) The project will not substantially degrade, in nonurbanized areas, the existing visual character or quality of public views of the site and its surroundings. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.

d) The project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.

II. Agriculture and Forestry Resources

a) The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

b) The project will not conflict with existing zoning for agricultural use or a Williamson Act contract. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

c) The project will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timber zoned “timberland production.” Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

d) There will be no loss of forest land and the project will not result in the conversion of forest land to non-forest use. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

e) The project will not involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

III. Air Quality

a) The project will not conflict with or obstruct implementation of the applicable air quality plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

b) The project will not result in a cumulatively considerable net increase of any pollutant criteria for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Such an impact will not occur because the project involves no ongoing sources of air pollution.

c) The project will not expose sensitive receptors to substantial pollutant concentrations. Such an impact will not occur because the project will not increase pollutant concentrations.

d) The project will not create objectionable odors affecting a substantial number of people.

IV. Biological Resources

a) The project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the Department, NMFS or U. S. Fish and Wildlife Service (USFWS).

Less than Significant impact. Commission adoption of Options 1, 2, or 3, or a combination thereof would result in the reopening of the SRFC sport fishery in 2026 on the Sacramento River and could result in a less restricted sport fishery on the American, Feather, and Mokelumne rivers. Federally and state listed fish species including Central Valley steelhead, Central Valley spring-run Chinook Salmon, and Sacramento River winter-run Chinook Salmon co-occur in these waters. Existing regulations prohibit take of these species and current sport fishing regulations, including seasonal and area closures, minimize angler contact with these species. Therefore, the proposed project will have no significant impacts to these species.

In addition, an open sport fishery with new daily bag and possession limits for SRFC would not result in a significant impact to SRFC. Daily bag and possession limits are established consistent with the Department's mission to manage California's diverse fisheries resources for their ecological value, their use and for the public's enjoyment. Furthermore, adding flexibility into the regulations to annually adjust the SRFC fishing season lengths on the American, Feather, Mokelumne, and Sacramento rivers will minimize fishery impacts during stressful environmental conditions such as low flows and low adult returns. These limits are designed to avoid adverse effects to the target species. Therefore, the proposed project will have no significant impacts to SRFC.

The project will create a fishing opportunity on non-native Brown Trout on the upper Sacramento River. Because Brown Trout are known predators and ecological

competitors with native salmonids, including juvenile Chinook Salmon, Coho Salmon and steelhead, the proposed regulation may result in a reduction of Brown Trout which will potentially reduce negative interactions between these species and ameliorate minor impacts to listed/candidate species associated with potential increased angling effort for Brown Trout.

b) The project will not have an adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, and regulations, or by the Department or USFWS. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

c) The project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

d) The project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

e) The project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Such an impact will not occur because the project will not result in any construction, land alteration, or land use changes.

f) The project will not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

V. Cultural Resources

a) The project will not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. There is no ground disturbing work or work permanently modifying any existing structure or resource and thus no potential to affect historical resources.

b) The project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. There is no ground disturbing work and thus no potential to affect archaeological resources.

c) The project will not disturb any human remains, including those interred outside of formal cemeteries. There is no ground disturbing work and thus no potential to affect human remains.

VI. Energy

a) The project will result in a potentially significant environmental impact due to wasteful inefficient, or unnecessary consumption of energy resources, during project construction or operations. Such an impact will not occur because the project will not use energy resources.

b) The project will not affect nor obstruct any state or local plan for renewable energy or energy efficiency.

VII. Geology and Soils

a i) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area, or based on other substantial evidence of a known fault. Such an impact will not occur because the project will not involve any construction or create any structures for human habitation.

a ii) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Such an impact will not occur because the project will not involve any construction or create any structures for human habitation.

a iii) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Such an impact will not occur because the project will not involve any construction or create any structures for human habitation.

a iv) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Such an impact will not occur because the project will not involve any construction, ground distrurbing work, or the creation of any structures for human habitation.

b) The project will not result in substantial soil erosion or the loss of topsoil. Such an impact will not occur because the project will not involve ground disturbing work.

c) The project will not be located on a geologic unit or soil that is unstable, or that would become unstable and potentially result in on- or off- site landslides, lateral spreading, subsidence, liquefaction, or collapse. Such an impact will not occur because the project will not involve ground disturbing work.

d) The project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Such an impact will not occur because the project will not involve ground disturbing work.

e) The project will not create any sources of waste water requiring a septic system.

f) The project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Such an impact will not occur because the project will not involve or indirectly result in ground disturbing work.

VIII. Greenhouse Gas (GHG) Emissions

a) The project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The project will not involve construction, land alteration, or land use changes.

Less than Significant impact. Commission adoption of Options 1, 2, or 3, or a combination thereof would result in the reopening of the SRFC sport fishery in 2026 on the Sacramento River and could result in a less restricted sport fishery on the American, Feather, and Mokelumne rivers. The Project would emit greenhouse gases (GHG) through the use of fuel in vehicles used to transport anglers to and from designated fishing areas. Regulations governing SRFC sport fishing in the Central Valley have been in effect for nearly 80 years. The SRFC fishery has been open during this period with the exception of fishing closures in 2008-2009 and 2023-24. Considering this, the Project will not generate a significant increase in GHG emissions above existing baseline levels.

The Department is proposing to allow harvest of Brown Trout on the upper Sacramento River to reduce predation on juvenile salmon and steelhead. The Brown Trout fishing season will coincide with the steelhead and SRFC fishing seasons. A Brown Trout fishery is usually secondary to Chinook Salmon and steelhead fisheries and are caught incidentally to these species. The addition of Brown Trout fishery on the upper Sacramento River is not expected to result in additional angler trips to the Sacramento River. Therefore, the project is not expected to result in an increase in GHG emissions.

b) The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG.

IX. Hazards and Hazardous Materials

a) The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The project will not involve the transport, use, or disposal of hazardous materials.

b) The project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The project will not involve the transport, use, or disposal of hazardous materials.

c) The project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The project will not involve the transport, use, or emission of any hazardous materials.

d) The project will not be located on any site that is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5.

e) The project will not be located within an airport land use plan area.

f) The project will not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project will not involve any construction, land alteration, or land use changes.

g) The project will not expose people or structures to a significant risk of loss, injury, or death involving wild land fires. The project will not involve any construction, land alteration, or land use changes.

X. Hydrology and Water Quality

a) The project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The project will not involve any construction, land alteration, water use, or water discharge.

b) The project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project will not involve any construction, land alteration, or groundwater use.

c i) The project will not substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in substantial erosion or siltation on- or off-site because the project will not involve any construction or land alteration.

c ii) The project will not substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in flooding on- or off-site because the project will not involve any construction or land alteration.

c iii) The project will not create or contribute runoff water that would exceed the capacity of existing or planned storm-water drainage systems, or provide substantial additional sources of polluted runoff because the project will not involve any construction or land alteration.

c iv) The project will not impede or redirect flood flows because the project will not involve any construction or land alteration.

d) In flood hazard, tsunami, or seiche zones, the project would not risk release of pollutants due to project inundation because the project would not involve any construction or land alteration.

e) The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project will not involve any construction, land alteration, or groundwater use.

XI. Land Use and Planning

a) The project will not physically divide an established community. The project will not involve any construction, land alteration, or land use changes.

b) The project will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project will not involve any construction, land alteration, or land use changes.

XII. Mineral Resources

a) The project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

b) The project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

XIII. Noise

a) The project will not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The project will not involve construction or physical alteration of land, and its implementation will not generate noise levels in excess of agency standards.

b) The project will not result in generation of excessive ground-borne vibration or ground-borne noise levels. The project will not involve construction or physical alteration of land.

c) The project will not be located within the vicinity of a private airstrip or an airport use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.

XIV. Population and Housing

a) The project will not induce substantial unplanned population growth in an area, either directly or indirectly. Such an impact will not occur because the project will not construct any new homes, businesses, roads, or other human infrastructure.

b) The project will not displace any existing people or housing and will not necessitate the construction of replacement housing elsewhere.

XV. Public Services

a) The project will not have any significant environmental impacts associated with new or physically altered governmental facilities. The project will not involve any construction, land alteration, or land use changes.

XVI. Recreation

a) The project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Less than Significant impact. Commission adoption of Options 1, 2, or 3, or a combination thereof would result in the reopening of the SRFC sport fishery in 2026 on the Sacramento River and could result in a less restricted sport fishery on the American, Feather, and Mokelumne rivers. Regulations governing SRFC sport fishing in the Central Valley have been in effect for nearly 80 years and the potential for increased fishing opportunity on the Sacramento, American, Feather, and Mokelumne rivers is not expected to result in an increase in new anglers or in the use of existing neighborhood and regional parks, or other recreational facilities.

The proposal to allow harvest of Brown Trout on the upper Sacramento River is anticipated to have minimal to no effect on recreational facilities. Harvest opportunity will be limited to the upper Sacramento River and to the fishing seasons for SRFC and steelhead. A Brown Trout fishery is usually secondary to other fisheries for Chinook Salmon and steelhead, and Brown Trout are caught incidentally to these species. Therefore, the potential for increased fishing opportunities on the Sacramento River is not expected to result in an increase in new anglers or in the use of existing neighborhood and regional parks, or other recreational facilities.

b) The project does not require construction or expansion of recreational facilities.

XVII. Transportation

a) The project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project involves no land use or transportation system modifications.

b) The project will not conflict or be inconsistent with CEQA guidelines, Title 14, CCR, Section 15064.3, subsection (b), which pertains to vehicle miles traveled. The amount and distance of vehicle miles traveled by recreational anglers should not change substantially under the proposed regulations.

c) The project will not increase hazards due to a geometric design feature or incompatible uses with equipment. The project involves no land use or transportation system modifications.

d) The project will not result in inadequate emergency access. The project involves no land use or transportation system modifications.

XVIII. Tribal and Cultural Resources

a) The project will not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1, subsection (k). The project does not involve ground disturbing work and does not have the potential to affect tribal cultural resources.

b) The project will not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. The project does not involve ground disturbing work and has no potential to affect tribal cultural resources.

XIX. Utilities and Service Systems

a) The project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities. The project does not involve any construction or land alteration.

b) The project requires no new water supplies.

c) The project will not produce wastewater.

d) The project will not generate solid waste. Thus, the project will be in compliance with state and local standards for solid waste.

e) The project will not create solid waste. Thus, the project will be in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

XX. Wildfire

a) The project will not impair an adopted emergency response plan or emergency evacuation plan.

b) The project will not exacerbate wildfire risks due to slope, prevailing winds, and other factors.

c) The project will not require the installation or maintenance of any infrastructure.

d) The project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

XXI. Mandatory Findings of Significance

a) The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The project is consistent with the Department's mission to manage California's diverse fisheries resources for their ecological value, their use and for the public's enjoyment.

b) The project does not have adverse impacts that are individually limited, but cumulatively considerable. Cumulative adverse impacts will not occur because there are no potential adverse impacts that are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c) The project does not have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly. The project will not involve any construction, land alteration, or the creation of new infrastructure.

Photo credit: CDFW

CENTRAL VALLEY CHINOOK SALMON SPORT FISHING REGULATIONS

PRESENTATION TO THE FISH AND GAME COMMISSION

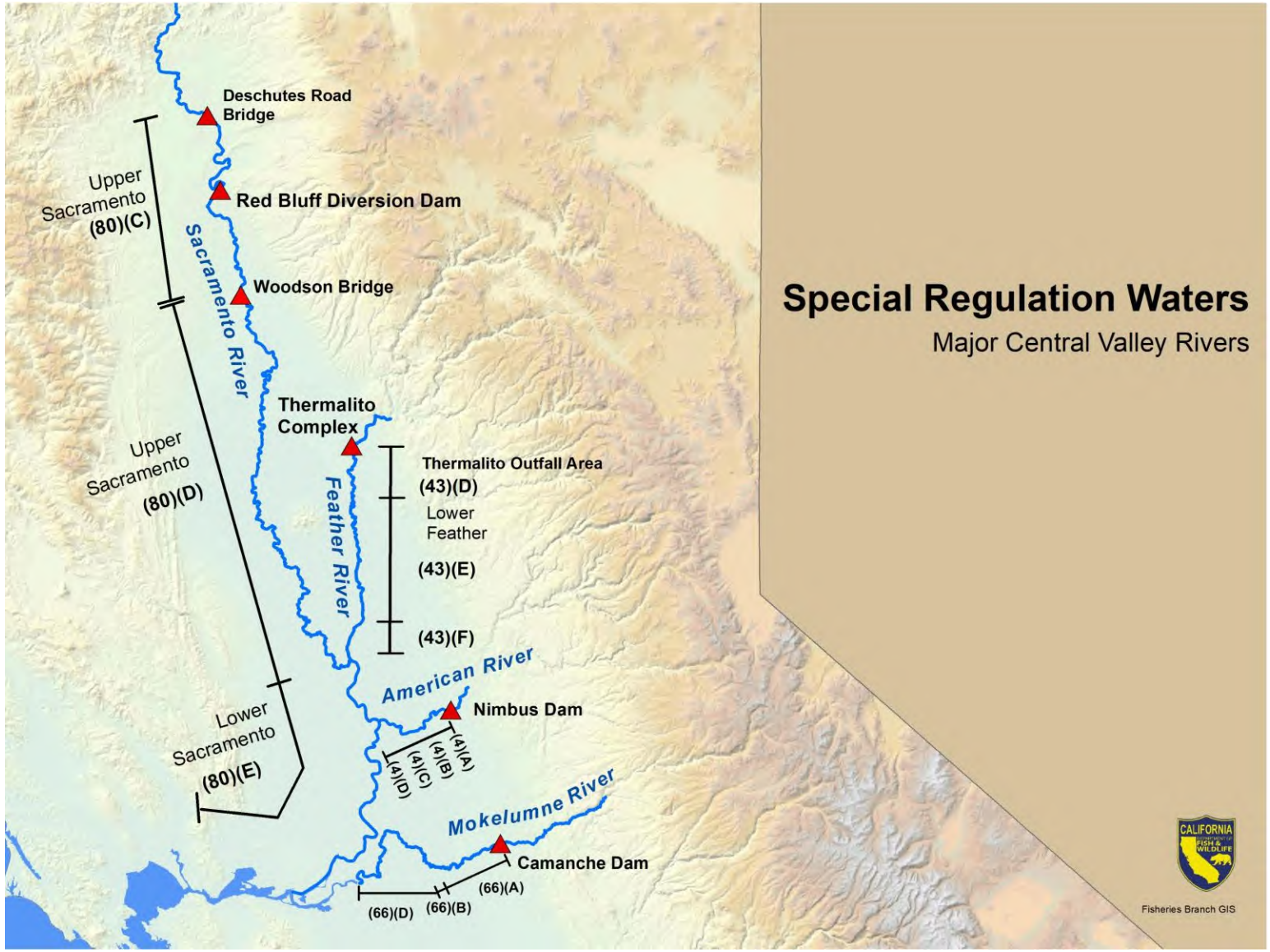
April 15-16, 2026

Jonathan Nelson
Anadromous Fisheries Program Manager
Fisheries Branch

Presentation Overview

- Map of Sacramento Fall-run Chinook Salmon (SRFC) special regulations waters
- Proposed 2026 SRFC regulatory recommendations for Sacramento, Feather, American, and Mokelumne rivers
- Proposed regulatory recommendations for Brown Trout Harvest on Sacramento River and updates to 7.40 Regulation Table for Central Valley Salmon Seasons
- Timeline

SRFC Special Regulation Waters



CDFW 2026 SRFC Recommendations: Summary

Sacramento River Basin Spawning Escapement Target: **211,143 natural/hatchery**

PFMC Sacramento River Basin Sport Fish Harvest Target: **35,808**

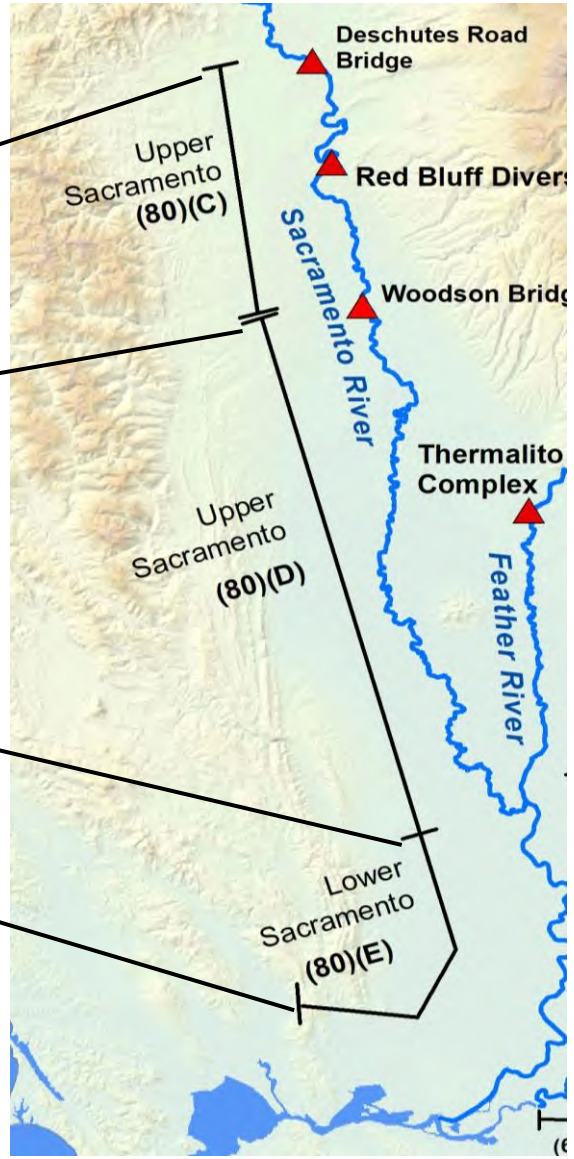
- Sacramento River and Delta:
  - All sections open full seasons; 2 bag/4 possession limit any size
- Feather River:
  - All sections open full seasons; 2 bag/4 possession limit any size
- American River:
  - All sections open full seasons; 2 bag/4 possession limit any size
- Mokelumne River:
  - All sections open full seasons; 2 bag/4 possession limit any size

Sacramento River Recommendations

Sacramento River 7.40(80) C, D, & E

Section	Open Season
C*	August 1 – December 31
D	July 16 - December 16
E	July 16 - December 16

Proposed 2 daily bag/4 possession limit of any size Chinook Salmon

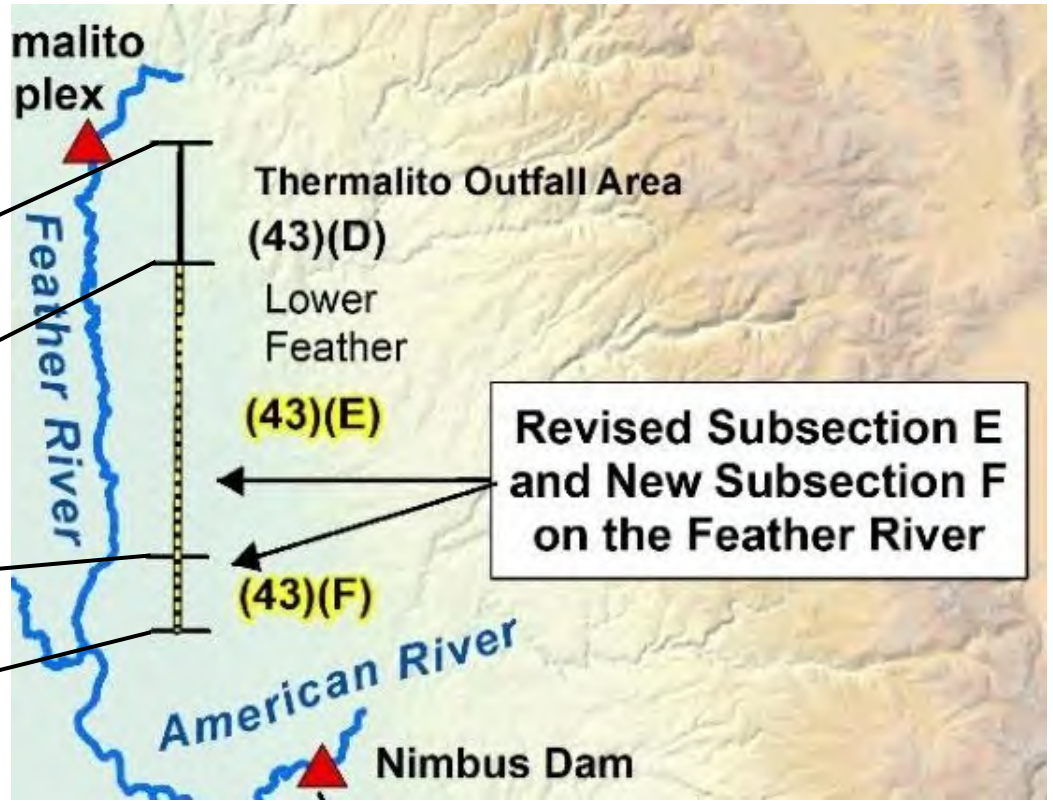


* *Angler Survey staff will be collecting tissue samples from harvested salmon to evaluate if Spring-run Chinook are being caught in the fishery*

Feather River Recommendations

Feather River 7.40(43) D, E, & F

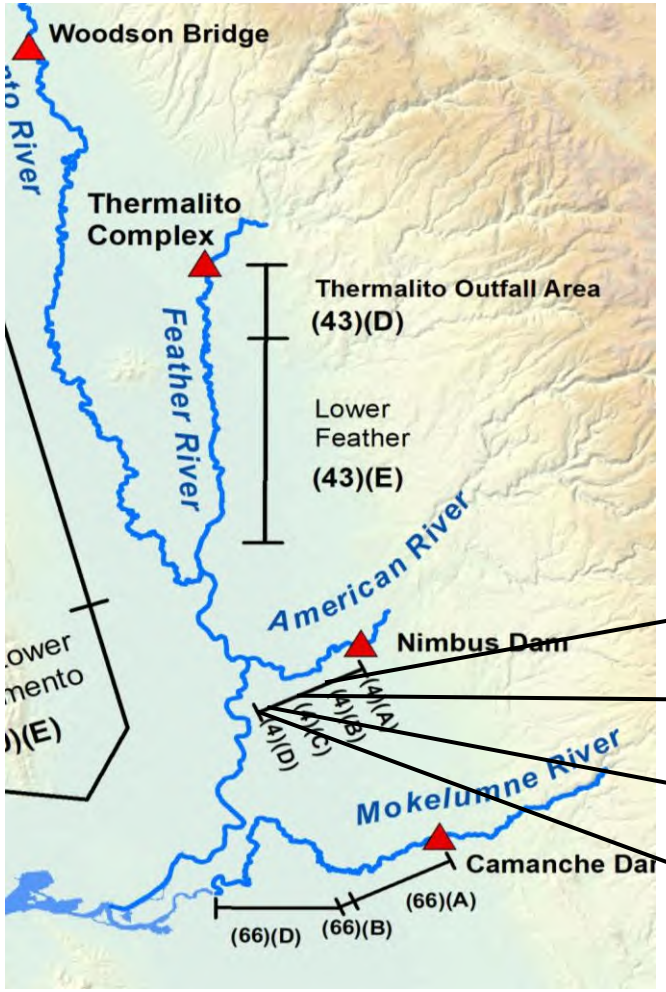
Section	Open Season
D	July 16 – October 31
E	July 16 - December 16
F	July 16 - December 16



Proposed 2 daily bag/4 possession limit of any size Chinook Salmon

American River Recommendations

American River 7.40(4) B, C, & D

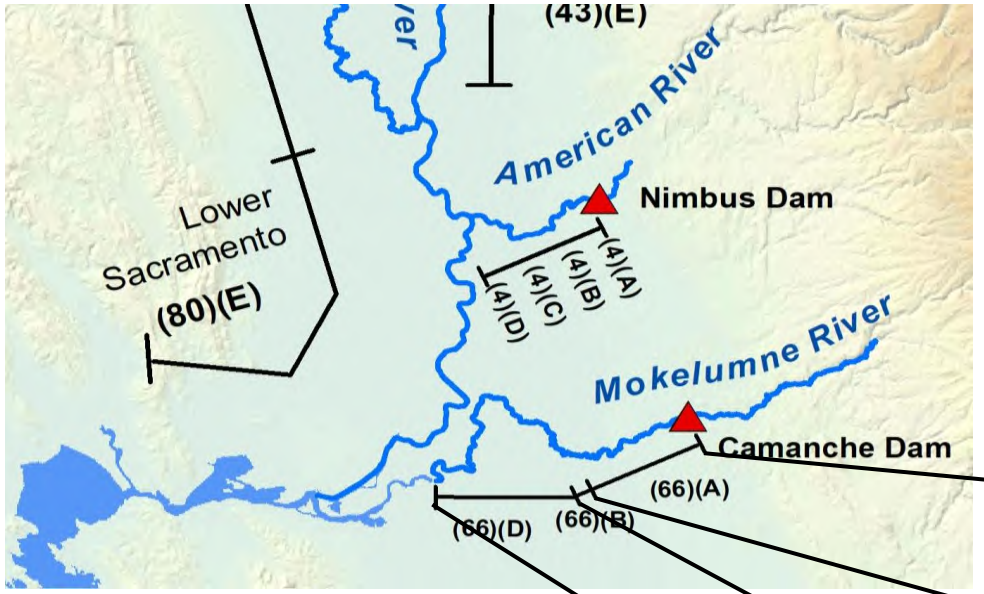


Proposed 2 daily bag/4 possession limit of any size Chinook Salmon

Section	Open Season
B	July 16 - October 31
C	July 16 - December 31
D	July 16 - December 16

Mokelumne River Recommendations

Mokelumne River 7.40(66) A, B, & D



Proposed 2 daily bag/4 possession limit of any size Chinook Salmon

Section	Open Season
A	July 16 - October 15
B	July 16 - December 31
D	July 16 - December 16

Additional Proposed Regulation Changes

1) Adding harvest of Brown Trout to Sacramento River sections 7.40b(80)B&C
   - Current regulations do not allow for harvest in these sections
   - Propose adding 5 fish bag daily/10 fish possession limit
   - This change can help reduce potential predation on native fish, limit expansion/growth of the population, and provide harvest opportunity

2) Separating SRFC seasons from other Sport Fish species in Table 7.40b
   - Currently seasons for SRFC are presented in same row as other sport fish
   - The recent change of SRFC season options does not apply to other sport fish
   - This change will improve clarification, remove redundant text, and uncouple the fishing seasons for these distinct fisheries

2026 Timeline

- *February 12th – Notice hearing*
- April 16th – Discussion Hearing (post PFMC recommendation)
- May 6th – Adoption Hearing
- New regulations go into effect July 16th

Photo credit: CDFW

Questions | Contact

Photo credit: CDFW

Jonathan Nelson

Anadromous Fisheries Program Manager

Fisheries Branch

Fisheries@wildlife.ca.gov

Staff Summary for February 11-12, 2026
(For Background Purposes Only)

19. Inland Sport Fishing

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

(A) **Central Valley sport fishing (annual)**
Consider authorizing publication of notice of intent to amend Central Valley sport fishing regulations.

(B) **Klamath River Basin sport fishing (annual)**
Consider authorizing publication of notice of intent to amend Klamath River Basin sport fishing regulations related to Chinook salmon.

Summary of Previous/Future Actions

(A) ***Central Valley***

• Wildlife Resources Committee (WRC) vetting	September 11, 2025; WRC
• **Today's notice hearing**	**February 11-12, 2026**
• Discussion hearing	April 15-16, 2026
• Adoption hearing	May 6, 2026

(B) ***Klamath River Basin***

• WRC vetting	September 11, 2025; WRC
• **Today's notice hearing**	**February 11-12, 2026**
• Discussion hearing	April 15-16, 2026
• Adoption hearing	May 6, 2026

Background

The Commission adopts Central Valley sport fishing regulations and Klamath River Basin sport fishing regulations on an annual basis to align state regulations with federal fishery management recommendations made by the Pacific Fishery Management Council (PFMC). PFMC will adopt its final regulatory recommendations in April 2026 for the upcoming season based on salmon abundance estimates and recommended ocean harvest.

Historically, the Commission has not amended regulations for fall and spring Klamath River Chinook salmon (KRFC and KRSC, respectively) sport fishing concurrently in its annual rulemaking. However, the KRSC sport fishery has been closed multiple times in the recent past through emergency regulations. The current stock status and need to compensate for large-scale changes in fishery effort necessitate the Commission considering annual changes to the regulations for this fishery. As a result, beginning with the 2025 season, the Department recommends that the Commission incorporate the management of KRSC into the annual Klamath sport fish rulemaking process.

The broad scope of the options in the draft initial statement of reasons and draft proposed regulatory language (exhibits A2, A3, B2, and B3) intentionally allows for flexibility in

developing the final regulations for each rulemaking, which is necessary to allow the Commission to quickly adopt regulations given the timing of the PFMC process. The Department will recommend specific regulations to the Commission at its April 2026 meeting for potential adoption at its May 2026 meeting.

Multiple options are presented today for bodies of water within each rulemaking.

(A) ***Central Valley***

- Option 1 – Allows the take of any size Chinook salmon up to the daily bag limits [0-4] and possession limits [0-12].
- Option 2 – Allows the take of a limited number of adult Chinook salmon, with grilse Chinook salmon making up the remainder of the daily bag limits [0-4] and possession limits [0-12]
- Option 3 – Allows a grilse-only Chinook salmon fishery up to the daily bag limit [0-4] and possession limit [0-12].
- Option 4 – Closed to the take and possession of Chinook salmon.

Additionally, a range of dates is indicated in [brackets] to allow for the ability to start the sport fishing season on a later date or end the season on an earlier date, per section of river or across the valley.

(B) ***Klamath River Basin***

- Option 1
  - Klamath River Fall Chinook (KRFC) Adult Stocks (Sport Fishery Quota Management)
    - Quota range of 0-67,600 adult KRFC, with a subquota applied to each section of river
    - Bag limit of [0-4] Chinook salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until a subquota is met in a section, then 0 fish over [20-24] inches total length for that section.
    - Possession limit of [0-12] Chinook salmon – of which no more than [0- 4] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.
  - Klamath River Spring Chinook (KRSC)
    - Bag limit of [0-1] Chinook salmon
    - Possession limit of [0-2] Chinook salmon
- Option 2
  - KRFC fishery closure
  - KRSC fishery closure

Staff Summary for February 11-12, 2026
(For Background Purposes Only)

Significant Public Comments (N/A)

Recommendation

Commission staff: Authorize publication of notices for Central Valley sport fishing and Klamath River Basin sport fishing as recommended by the Department.

Wildlife Resources Committee: Authorize publication of notices as recommended by the Department.

Department: Authorize publication of notices consistent with the draft initial statement of reasons and draft proposed regulatory language.

Exhibits

A1. Department memo, received January 22, 2026
A2. Draft initial statement of reasons (Central Valley)
A3. Draft proposed regulatory language (Central Valley)
A4. Draft economic and fiscal impact statement (STD. 399) (Central Valley)
A5. Department presentation (Central Valley)
B1. Department memo, received January 6, 2026
B2. Draft initial statement of reasons (Klamath River Basin)
B3. Draft proposed regulatory language (Klamath River Basin)
B4. Draft economic and fiscal impact statement (STD. 399) (Klamath River Basin)
B5. Department presentation (Klamath River Basin)

Motion

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend subsection 7.40(b)(4) et al., related to Central Valley sport fishing regulations.

AND

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend subsection 7.40(b)(50), related to Klamath River Basin sport fishing regulations.

State of California
Fish and Game Commission
Initial Statement of Reasons for Regulatory Action

Amend Subsection (b)(50) of Section 7.40
Title 14, California Code of Regulations
Re: Klamath River Basin Sport Fishing 2026

I. Date of Initial Statement of Reasons: November 13, 2025

II. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: February 12, 2026 Location: Sacramento

(b) Discussion Hearing

Date: April 16, 2026 Location: Sacramento

(c) Adoption Hearing

Date: May 6, 2026 Location: Teleconference

III. Description of Regulatory Action

(a) Statement of Specific Purpose of Regulatory Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

The Klamath River Basin, which consists of the Klamath River and Trinity River systems, is managed for fall-run Chinook Salmon (*Oncorhynchus tshawytscha*) through a cooperative system of state, federal, and tribal management agencies. Salmonid regulations are designed to meet natural and hatchery escapement needs for salmonid stocks, while providing equitable harvest opportunities for ocean sport, ocean commercial, river sport, and tribal fisheries.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of sport and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The California Fish and Game Commission (Commission) adopts regulations for the ocean salmon sport (inside three miles) and the Klamath River Basin (in-river) sport fisheries which are consistent with federal fishery management goals.

Tribal entities within the Klamath River Basin maintain fishing rights for ceremonial, subsistence, and commercial fisheries that are managed consistent with federal fishery management goals. Tribal fishing regulations are promulgated by individual tribal governments.

Klamath River Fall-Run Chinook Salmon
Adult Klamath River fall-run Chinook Salmon (KRFC) harvest allocations and natural-area spawning escapement goals are established by PFMC. The KRFC harvest allocation between tribal and non-tribal fisheries is based on court decisions and allocation agreements between the various fishery representatives.

PFMC Overfishing Review
KRFC stocks have been designated as "overfished" by PFMC. This designation is the result of not meeting conservation objectives for these stocks. Management objectives and criteria for KRFC are defined in the PFMC Salmon Fishery Management Plan (FMP). The threshold for overfished status of KRFC is a three-year geometric mean less than or equal to 30,525 natural area adult spawners. This overfished-threshold was met for KRFC during the 2015-2017 period. The 30,525 KRFC natural area adult spawners is considered the minimum stock size threshold, per the FMP. The KRFC adult natural area spawning escapement for 2024 was 24,0324 natural area adult spawners, which is below the one-year conservation threshold of 40,700 natural area adult spawners. The most recent three-year geometric mean of 27,962 is still less than the required 40,700 natural area adult spawners conservation threshold, therefore the KRFC are still considered an "overfished" stock.

Accordingly, the FMP outlines a process for preparing a "rebuilding plan" that includes assessment of the factors that led to the decline of the stock, including fishing, environmental factors, model errors, etc. The rebuilding plan includes recommendations to address conservation of KRFC, with the goal of achieving rebuilt status. Rebuilt status requires meeting a three-year geometric mean of 40,700 adult natural area KRFC spawner escapement. The plan developed by representatives of NMFS, PFMC, U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife (Department), and tribal entities, was submitted to PFMC in February 2019, adopted by PFMC in June 2019, and submitted to NMFS in August 2019. Forthcoming recommendations from the rebuilding plan may alter how KRFC are managed in the future, including changing the in-river allocation number, and/or allocating less than the normal target number.

Klamath River Spring Chinook Salmon
The Klamath River Basin also supports Klamath River spring Chinook Salmon (KRSC). Naturally produced KRSC are both temporally and spatially separated from KRFC in most cases. Presently, KRSC stocks are not managed or allocated by PFMC. This in-river sport fishery is managed by general basin seasons, daily bag limit, and possession limit regulations. KRSC harvest is monitored on the Klamath River below the Highway 96 bridge at Weitchpec to the mouth of the Klamath River by creel survey. The upper Trinity River, upstream of Junction City, is monitored using tag returns from anglers.

KRFC Allocation Management
The PFMC allocation for the Klamath River Basin sport harvest is normally a minimum of 15 percent of the non-tribal PFMC harvest allocation of KRFC. Preseason stock projections of 2026 adult KRFC abundance will not be available from PFMC until March 2026. The 2026 basin allocation will be recommended by PFMC in April 2026. That allocation will inform the quota that the Department proposes to the Commission for adoption as a quota for the in-river sport harvest at the Commission's May 2026 teleconference meeting.

The Commission may adopt a KRFC in-river sport harvest quota that is different than the quota proposed by the Department or the PFMC 2026 allocation for that fishery. Commission modifications need to meet biological and fishery allocation goals specified in law or established in the FMP.

The annual KRFC in-river sport harvest quota is specified in subsection 7.40(b)(50)(D)1. The quota is split among four geographic areas with a subquota for each area, expressed as a percentage of the total in-river quota, specified in subsection 7.40(b)(50)(D)2. For angler convenience, the subquotas, expressed as the number of fish, are listed for the affected river segments in subsection 7.40(b)(50)(E).

The in-river sport subquota percentages are shown in Figure 1, and are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the in-river sport quota;

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the in-river sport quota;

The spit area (within 100 yards of the channel through the sand spit formed at the Klamath River mouth) closes to all fishing after 15 percent of the total Klamath River Basin quota has been taken downstream of the Highway 101 bridge.

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the in-river sport quota; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the in-river sport fishery quota.

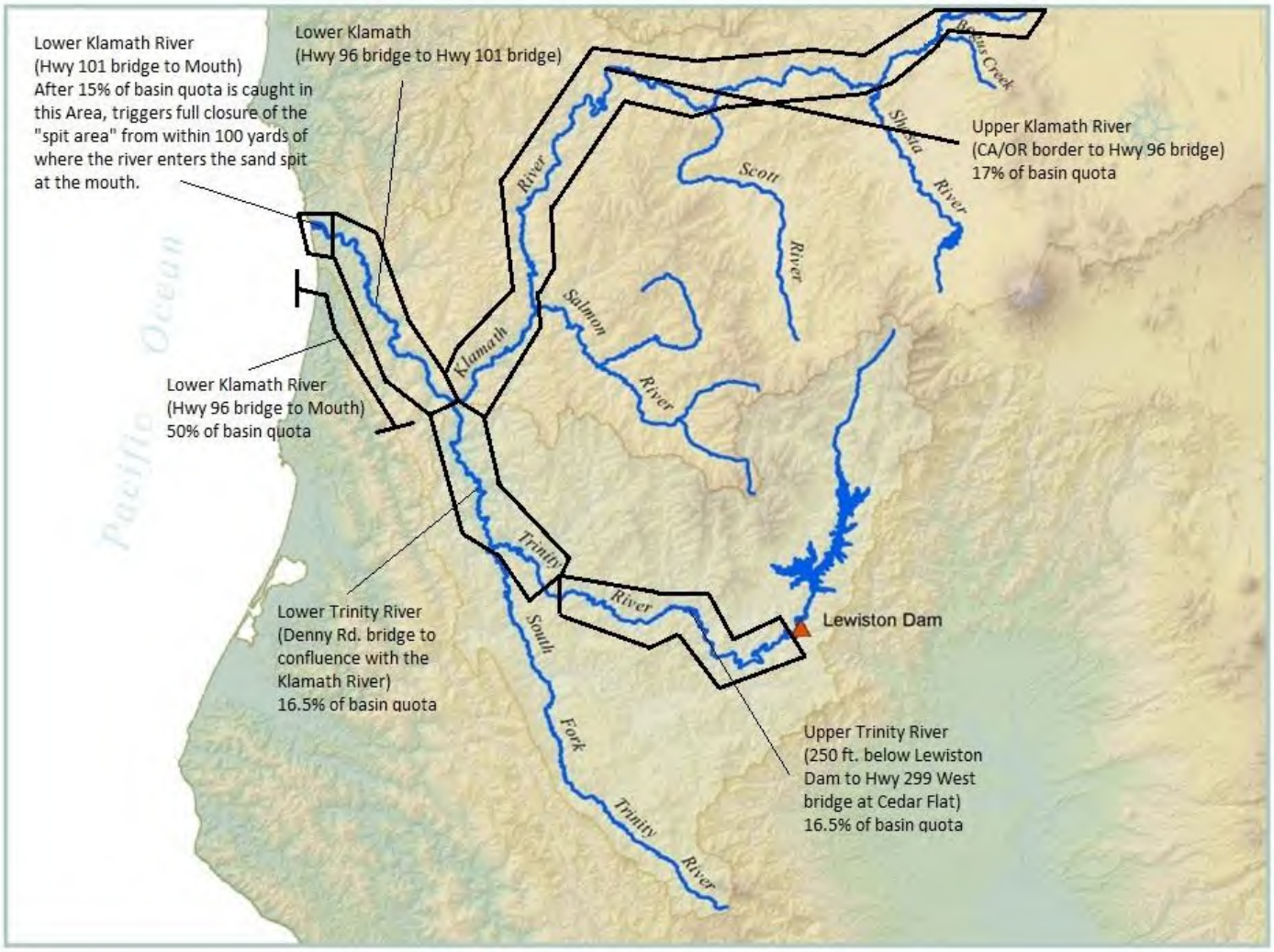


Figure 1. Map of the Klamath River Basin, showing the subquota areas of the Trinity and Klamath rivers.

These geographic areas are based upon the historical distribution of angler effort to ensure equitable harvest of adult KRFC in the Klamath River and Trinity River. The subquota system requires the Department to monitor or assess angler harvest of adult KRFC in each geographic area. All areas are monitored on a real time basis, except for the Klamath River upstream of Weitchpec and in the Trinity River. Due to funding and personnel reductions, the Department does not currently conduct real time harvest monitoring in the Klamath River upstream of the Weitchpec and in the Trinity River.

The Department has developed Harvest Predictor Models (HPM), which incorporate historic creel survey data from the Klamath River downstream of Iron Gate Dam to the confluence with the Pacific Ocean, and the Trinity River downstream of Lewiston Dam to the confluence with the Klamath River. Each HPM is driven by the positive relationship between KRFC harvested in the respective lower and upper subquota areas of the Klamath River and the Trinity River. The HPMs will be used by the Department to implement fishing closures to ensure that anglers do not exceed established subquota targets. Using this method, the upper Klamath River subquota area generally closes between 28-30 days after the lower Klamath River subquota is reached. Similarly, the upper Trinity River subquota area generally closes 45 days after the lower Klamath River subquota has been met. The Department also takes into consideration several other factors when implementing closure dates for subquota areas, including angler

effort, KRFC run timing, weir counts, and ongoing recreational creel surveys performed by the Hoopa Valley Tribe in the lower Trinity River below Willow Creek.

Sport Fishery Management
The KRFC in-river sport harvest quota is divided into geographic areas, and harvest is monitored under real time subquota management. The KRSC in-river sport harvest is managed by general season, daily bag limit, and possession limit regulations.

The Department presently differentiates the two stocks by the following sport fish season in each sub-area:

Klamath River

July 1 through August 14 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth.

August 15 to December 31 – KRFC quota management.

Trinity River

July 1 through August 31 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Trinity River downstream of the Old Lewiston Bridge to the confluence with the South Fork Trinity River.

September 1 through December 31 – KRFC quota management.

Current regulations in subsections 7.40(b)(50)(E)2.a. through 2.e. specify bag limits for KRFC and KRSC stocks in the Klamath River. Current regulations in subsections 7.40(b)(50)(E)6.b., e., and f. specify bag limits for KRFC and KRSC stocks in the Trinity River. Current regulations in subsections 7.40(b)(50)(C)2.a. and 2.b. specify KRSC and KRFC possession limits, respectively.

Proposed Changes

KRFC Adult Stocks (Sport Fishery Quota Management)

As in prior years, the Department proposes a range for the quota, daily bag and possession limits, and size limits for KRFC.

Quota: For public notice requirements, the Department recommends the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows the Commission to make adjustments during the 2026 regulatory cycle.

Subquotas: The proposed subquotas for KRFC stocks are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the total quota equates to [0-11,492];

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the total quota equates to [0-33,800];

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the total quota equates to [0-11,154]; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the total quota equates to [0-11,154].

Seasons:

- Klamath River - August 15 through December 31
- Trinity River - September 1 through December 31

KRFC Option 1: Bag and Possession Limits

Because the PFMC recommendations are not known at this time, ranges are shown in [brackets] below of bag and possession limits which encompass historical quotas. All are proposed for the 2026 KRFC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-4] Chinook Salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until the subquota is met, then 0 fish over [20-24] inches total length.
- Possession limit - [0-12] Chinook Salmon of which no more than [0-12] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.

The final KRFC bag and possession limits will align with the final federal regulations to meet biological and fishery allocation goals specified in law or established in the FMP.

As in previous years, no retention of adult KRFC is proposed once the subquota has been met.

Size Limits

KRFC are managed based on adult quotas which is the maximum number of adult fish (age three and older) that can be harvested. In 2023, the Department moved away from the fixed standing cutoff size between grilse and adult Chinook Salmon of 23 inches total length to using a range between 20 to 24 inches total length as an annual option for cutoff size. This allows for annual variation in size cutoffs, as informed by previous year(s) data to manage the harvest of the adult KRFC quota more effectively. The Department is currently conducting a post season assessment of KRFC length and age data which will be used to help determine the proposed 2026 size cutoff. The 2026 proposed adult cutoff size will be presented at the April 2026 Commission meeting.

KRFC Option 2: KRFC Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure of ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to and support any federal action. This option prohibits all methods of targeting KRFC, including catch and release fishing.

KRSC Sport Fishery

KRSC stocks are not managed or allocated by PFMC. This in-river sport fishery is managed by general basin seasons, daily bag limit, and possession limit regulations. The KRSC sport fishery is now incorporated into the annual Klamath sport fish rulemaking process to allow for adaptive management of stock status and the need to compensate for large-scale changes in fishery effort.

Seasons:

- Klamath River – July 1 through August 14
- Trinity River – July 1 through August 31

KRSC Option 1: Bag and Possession Limits

Ranges are shown in [brackets] below of bag and possession limits which encompass historical ranges. All are proposed for the 2026 KRSC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-1] Chinook Salmon
- Possession limit - [0-2] Chinook Salmon.

KRSC Option 2: KRSC Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRSC should the Department be concerned with stock status or predict a large shift in effort due to widespread salmon closures in other areas of the state. In any year, should the PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to potential effort shift. This option prohibits all methods of targeting KRSC including catch and release fishing.

Other Changes for Clarity

Language referencing the size of an adult fish is removed from subsection (50)(E)2.e. in the second column as the size is already included in the following column as a range in the options provided. This change is necessary for consistency and clarity. Also, in subsections (50)(C)2., (50)(D)2.b., and (50)(E)2.e the words “to the mouth” have been added. This is necessary to clarify the lower boundary of this stretch of the Klamath River to be the mouth of the river as it meets the ocean for enforcement purposes, and consistency in how the lower boundary of other river reaches are described.

(b) Goals and Benefits of the Regulation

It is the policy of this state to encourage the conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the state for the benefit of all the citizens of the state and to promote the development of local fisheries and distant water fisheries based in California in harmony with international law, respecting fishing and the conservation of the living resources of the ocean and other waters under the jurisdiction and influence of the state. The objectives of this policy include, but are not limited to, the maintenance of sufficient populations of all species of aquatic organisms to ensure their continued existence, and the maintenance of a sufficient resource to support a reasonable

sport use. Adoption of scientifically-based Klamath River Basin salmon seasons, size limits, and bag and possession limits provide for the maintenance of sufficient populations of salmon to ensure their continued existence.

The benefits of the proposed regulations are conformance with federal fishery management goals, sustainable management of Klamath River Basin fish resources, health and welfare of California residents, and promotion of businesses that rely on salmon sport fishing in the Klamath River Basin.

(c) Authority and Reference Sections from Fish and Game Code for Regulation

Authority: Sections 200, 205, 265, 270, 315, 316.5, 399, and 2084, Fish and Game Code

Reference: Sections 200, 205, 265, 270, 316.5, and 2084, Fish and Game Code

(d) Specific Technology or Equipment Required by Regulatory Change

None.

(e) Identification of Reports or Documents Supporting Regulation Change

In-River Sport Fishing Economics Technical Report, National Oceanographic and Atmospheric Administration, National Marine Fisheries Service, September 2011. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=164441&inline

(f) Public Discussions of Proposed Regulations Prior to Notice Publication

The Department discussed the proposed amendments to the annual Klamath River Basin regulations at the Commission's Wildlife Resources Committee meeting on September 11, 2025.

IV. Description of Reasonable Alternatives to Regulatory Action

(a) Alternatives to Regulation Change

No alternatives were identified by or brought to the attention of Commission staff that would have the same desired regulatory effect.

(b) No Change Alternative

The No Change Alternative would leave the existing salmon fishing closure in the Klamath River Basin in place for both KRFC and KRSC. This would not allow the Commission to re-open salmon fishing in the Klamath River Basin in 2026 should PFMC preseason stock projections of 2026 adult KRFC be sufficient to allow an in-river sport fishery in 2026.

(c) Description of Reasonable Alternatives that Would Lessen Adverse Impact on Small Business

None identified.

V. Mitigation Measures Required by Regulatory Action

The proposed regulatory action will have no significant adverse effect on the environment, and therefore, no mitigation measures are needed.

VI. Impact of Regulatory Action

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

(a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States

The proposed regulation will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The proposed regulations are projected to range from minor to no impact on the net revenues to local businesses servicing sport fishermen. Additionally, the in-river harvest is almost exclusively for KRFC, therefore no significant impacts are anticipated from the proposed changes to the KRSC regulations. If the 2026 KRFC quota is reduced, visitor spending may correspondingly be reduced, and in the absence of alternative visitor activities, the drop in spending could induce some business contraction, but this would match the conditions of the current closure that has persisted since 2023. If the 2026 KRFC quota remains similar to the KRFC quotas allocated in previous years, then local economic impacts are expected to be beneficial as anglers return to the fishery. Neither scenario is expected to directly affect the ability of California businesses to compete with businesses in other states.

(b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment

An estimated 30-50 businesses that serve sport fishing activities are expected to be directly and/or indirectly affected depending on the final KRFC quota. The impacts range from no impact (Projection 1 under the Economic Impact Assessment (EIA), below) to small adverse impacts (Projection 3, EIA, below).

Depending on the final KRFC quota, the Commission anticipates the potential for some impact on the creation or elimination of jobs in California. The potential adverse employment impacts range from no impact to the loss of 14 jobs. Under all alternatives, due to the limited time period of this regulation's impact, the Commission anticipates no impact on the creation of new businesses, the elimination of existing businesses, or the expansion of businesses in California.

For all of the proposed scenarios, the possibility of growth of businesses to serve alternative recreational activities exists. Adverse impacts to jobs and/or businesses would be less if fishing of other species and grilse KRFC is permitted, than under a complete closure to all fishing. The impacted businesses are generally small businesses employing few individuals and, like all small businesses, are subject to failure for a variety of causes. Additionally, the long-term intent of the proposed regulatory action is to increase sustainability in fishable salmon stocks and, consequently, promote the long-term viability of these same small businesses. Finally, the in-river harvest is almost exclusively for KRFC, therefore no significant impacts are anticipated from the proposed changes to the KRSC regulations.

The proposed regulations will benefit the health and welfare of California residents and the state's environment by responsibly managing KRFC and KRSC populations and facilitating outdoor recreational opportunities associated with them now and in the future. The regulations

are not expected to affect worker safety.

(c) Cost Impacts on a Representative Private Person or Business

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State

None.

(e) Nondiscretionary Costs/Savings to Local Agencies

None.

(f) Programs Mandated on Local Agencies or School Districts

None.

(g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code

None.

(h) Effect on Housing Costs

None.

VII. Economic Impact Assessment

The proposed amendments under consideration will set the 2026 Klamath River Basin salmon sport fishing regulations to conform to the PFMC KRFC allocation and will set the regulations for the KRSC as well. If the Klamath River Basin is opened for salmon sport fishing levels could be similar to the levels in the 2022 sport fishing season (the last year where salmon fishing was open – no closure year). Ocean closures may in turn result in PFMC recommendations for Klamath River Basin salmon sport fishery closures for the take of adult KRFC. Adverse or positive impacts to jobs and businesses will depend on the 2026 KRFC allocation ultimately adopted by the PFMC, and the specific regulations promulgated by the Commission, in conjunction with the Department. The in-river harvest is almost exclusively for KRFC, therefore no significant impacts are anticipated from the proposed changes to the KRSC regulations.

The proposed quota of 0 to 67,600 adult KRFC in 2026 represents a range from 0 percent or no salmon fishing on adult KRFC to greater than 100 percent of the 2022 Klamath River Basin KRFC quota. Under all scenarios, sport fishing may be allowed for other sport fish species and most likely for grilse KRFC, regardless of PFMC allocation. Thus, any adverse impacts to businesses could be less severe than under a complete closure of fishing.

The preservation of Klamath River salmon stocks is vital for the ongoing success of Klamath River Basin businesses that provide goods and services related to sportfishing. Scientifically-based KRFC allocations are necessary for the continued preservation of the resource, and therefore the prevention of adverse economic impacts.

A 2011 NMFS report (*In-River Sport Fishing Economics Technical Report*), reports that non-resident (outside the Eureka/Crescent City area) salmon or steelhead angler average

expenditures are estimated to be $136.56 (2025$) per angler day (for lodging, food, gasoline, fishing gear, boat fuel, and guide fees). The projections do not distinguish between spring and fall runs, however, the report states that the in-river harvest is almost exclusively fall-run. The NMFS report also excluded the Trinity River, the largest tributary to the Klamath. Since the Trinity River is allocated 33 percent of the KRFC total quota, this share is used to expand salmon and steelhead angler effort, and thus impacts on associated businesses that support anglers.

In a normal year, the total non-resident angler contribution to the entire Klamath River Basin (including the Trinity River) is estimated to be about $1,380,464 (2025$) in direct expenditures, resulting in about $2,422,280 (2025$) in total economic output that supports an estimated 28 jobs throughout the state. This is a conservative estimate of total economic impact as it counts only non-resident angler expenditures. The total impact of non-resident angler direct expenditures on labor income, total economic output, and jobs are shown in Table 1.

Table 1. Klamath River Basin* Salmon and Steelhead Economic Impact 2022 (2025$)

Klamath Sportfishing	Salmon	Steelhead	Total Impact
Expenditures	$1,365,600	$3,730	$1,380,464
Labor Income	$764,144	$2,087	$766,231
Total Economic Impact	$2,415,682	$6,598	$2,422,280
Total Jobs Impact	28.1	0.1	28.2

Sources: Department Northern Region Creel 2022 surveys, *In-River Sport Fishing Economics Technical Report*, National Oceanographic and Atmospheric Administration, National Marine Fisheries Service, September 2011. * Lower Klamath and Trinity Rivers.

Local resident average expenditures per angler day are estimated to be 60 percent less (markedly reduced lodging, gasoline, and food expenditures), which yields an estimate of $53.08 (2024$) per angler day. Creel surveys in the Department's Northern Region (Del Norte, Humboldt, Lassen, Mendocino, Modoc, Shasta, Siskiyou, Tehama and Trinity counties) reveal that local resident (Eureka/Crescent City) anglers comprise about 22 percent of Klamath River Basin anglers, with a majority (78%) of anglers coming from outside the immediate locale. Any decreases to expenditures by resident anglers associated with reduced fishing opportunities may be offset by increased expenditures on other locally purchased goods and services – with no net change in local economic activity. Thus, the economic impact analysis focuses on non-resident angler expenditures which represent new money whose injection serves to stimulate the local economy.

Economic Impact Projections

To demonstrate the potential economic impacts that may result from a quota anywhere within the range of 0-67,600 KRFC, three adult salmon catch projections are as follows: 100 percent of the 2022 adult KRFC catch limit; 50 percent of the 2022 adult KRFC catch limit; and 0 percent of the 2022 adult KRFC catch limit.

(a) Effects of the Regulation on the Creation or Elimination of Jobs Within the State

Projection 1: 100 percent of the proposed adult KRFC catch limit: The Commission does not anticipate any adverse impacts on the creation or elimination of jobs, as the quotas would not decrease effort nor curtail the number of visitors and thus probable visitor expenditures in the fisheries areas, as it would be an increase from the 2025 complete closure.

Projection 2: 50 percent of the proposed adult KRFC catch limit: The Commission anticipates some impact on the creation or elimination of jobs, which may be partially offset. The decline in visits may result in some decline in business activity, but the Commission does not anticipate any impacts on the creation of new businesses or the elimination of existing businesses directly related to fishing activities, as this would represent a net increase in visits from the 2025 complete closure of the fishery. However, with less effort being expended on salmon fishing, the possibility of alternative activities and the growth of businesses to serve those activities exists.

Projection 3: A KRFC closure or 0 percent of the proposed adult KRFC quota and KRSC closure: In the event of fisheries closures for adult KRFC in some or all Klamath River Basin areas, the Commission anticipates less than 50 percent reduction in fishery-related jobs. As mentioned above, sport fishing for other species and grilse KRFC may still be allowed, thus mitigating potential job losses. A closure on the take of all KRFC was instituted in 2017, and only steelhead could be legally harvested during the fall season. The 2017 closure resulted in nearly a 50 percent drop in angler days. However, job creation or elimination tends to lag in response to short-term changes in consumer demand. The Commission anticipates a decline in regional spending and thus reduced revenues to the approximately 30 to 50 businesses that directly and indirectly serve sport fishing activities as compared to Projection 1, with unknown impacts on the creation of new business or the elimination of existing businesses. However, adverse impacts may be mitigated by the continued opportunity to harvest other sport fish and the potential for the substitution of salmon fishing with other recreational activities. Additionally, the long-term intent of the regulatory action is to increase sustainability in fishable salmon stocks and, consequently, the long-term viability of these same small businesses. Finally, it should be noted that Projection 3 is the current state of the fishery since the closure began in 2023.

(b) Effects of the Regulation on the Creation of New Businesses or the Elimination of Existing Businesses Within the State

Projection 1: 100 percent of the 2022 adult KRFC catch limit: The Commission does not anticipate any impacts on the creation of new business or the elimination of existing businesses, as the quotas would not decrease effort nor curtail the number of visitors and thus probable visitor expenditures in the fisheries areas.

Projection 2: 50 percent of the 2022 adult KRFC catch limit: The Commission anticipates a decline in visits to the fishery areas of less than 50 percent due to the continued sport fishing allowed for other species and grilse KRFC. This may result in some decline in business activity, but the Commission does not anticipate any impacts on the creation of new businesses, or the elimination of existing businesses directly related to fishing activities. However, with less effort being expended on salmon fishing, the possibility of alternative sportfishing activities and the growth of businesses to serve those activities exists.

Projection 3: 0 percent of the 2022 adult KRFC catch limit (0 percent of the proposed adult KRFC quota and KRSC closure): In the event of salmon fisheries closures for adult KRFC in some or all Klamath River Basin areas, the Commission anticipates a decline in regional spending and thus reduced revenues to the approximately 30 to 50 businesses that directly and indirectly serve sport fishing activities with unknown impacts on the creation of new business or the elimination of existing businesses. However, adverse impacts may be

mitigated by the continued opportunity to harvest other sportfish and the potential for take of grilse KRFC. Additionally, the long-term intent of the proposed regulatory action is to increase sustainability in fishable salmon stocks and, consequently, promote the long-term viability of these same small businesses.

(c) Effects of the Regulation on the Expansion of Businesses Currently Doing Business Within the State

Projection 1: 100 percent of the 2022 adult KRFC catch limit: The Commission does not anticipate any impacts on the expansion of businesses in California as the quotas would not increase effort nor increase the number of visitors and thus probable visitor expenditures in the fisheries areas.

Projection 2: 50 percent of the 2022 adult KRFC catch limit: The Commission does not anticipate any impacts on the expansion of businesses currently doing business within the State. Decreases in expenditures by resident anglers associated with reduced fishing opportunities may be offset by increased expenditures on other locally purchased goods and services – with no net change in local economic activity. For non-resident anglers, however, decreases in local expenditures associated with decreases in local fishing opportunities may result in increases in other expenditures outside the Klamath River Basin area.

Projection 3: 0 percent of the 2022 adult KRFC catch limit (0 percent of the proposed adult KRFC quota and KRSC closure): In the event of salmon fisheries closures for adult KRFC in some or all Klamath River Basin areas, the Commission does not anticipate any expansion of businesses in California. Decreases in expenditures by anglers associated with reduced fishing opportunities may be partially offset by increased expenditures on other locally purchased goods and services as anglers pursue other sportfish, potentially including grilse KRFC, or the substitution of salmon fishing with other recreational activities.

(d) Benefits of the Regulation to the Health and Welfare of California Residents

Under all projections, the Commission anticipates benefits to the health and welfare of California residents. Providing opportunities for a Klamath River Basin salmon sport fishery and other sport fisheries encourages a healthy outdoor activity and the consumption of a nutritious food. Sport fishing also contributes to increased mental health of its practitioners, as fishing is a hobby and form of relaxation for many. Sport fishing also provides opportunities for multi-generational family activities and promotes respect for California’s environment by the future stewards of California’s natural resources.

(e) Benefits of the Regulation to Worker Safety

Under all projections, the Commission does not anticipate benefits to worker safety because the proposed regulations will not impact working conditions.

(f) Benefits of the Regulation to the State’s Environment

Under all projections, the Commission anticipates benefits to the environment in the sustainable management of Klamath River Basin salmonid resources. It is the policy of this State to encourage the conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the State for the benefit of all the citizens of the State and to promote the development of local fisheries and distant water

fisheries based in California in harmony with international law, respecting fishing and the conservation of the living resources of the ocean and other waters under the jurisdiction and influence of the State. The objectives of this policy include, but are not limited to, the maintenance of sufficient populations of all species of aquatic organisms to ensure their continued existence, and the maintenance of a sufficient resource to support a reasonable sport use. Adoption of scientifically-based Klamath River Basin salmon seasons, size limits, and bag and possession limits provides for the maintenance of sufficient populations of salmon to ensure their continued existence.

(g) Other Benefits of the Regulation

Consistency with Federal Fishery Management Goals: California's salmon sport fishing regulations need to align with the new Federal regulations to achieve optimum yield in California. The PFMC annually reviews the status of west coast salmon populations. As part of that process, it recommends west coast adult salmon fisheries regulations aimed at meeting biological and fishery allocation goals specified in law or established in the FMP. These recommendations coordinate west coast management of sport and commercial ocean salmon fisheries off the coasts of Washington, Oregon, and California, and California inland salmon sport fisheries. These recommendations are subsequently implemented as ocean fishing regulations by the NMFS, and as salmon sport regulations for State marine and inland waters by the Commission.

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

The Klamath River Basin, which consists of the Klamath River and Trinity River systems, is managed for fall-run Chinook Salmon (*Oncorhynchus tshawytscha*) through a cooperative system of state, federal, and tribal management agencies. Salmonid regulations are designed to meet natural and hatchery escapement needs for salmonid stocks, while providing equitable harvest opportunities for ocean sport, ocean commercial, river sport, and tribal fisheries.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of sport and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The California Fish and Game Commission (Commission) adopts regulations for the ocean salmon sport (inside three miles) and the Klamath River Basin (in-river) sport fisheries which are consistent with federal fishery management goals.

Tribal entities within the Klamath River Basin maintain fishing rights for ceremonial, subsistence, and commercial fisheries that are managed consistent with federal fishery management goals. Tribal fishing regulations are promulgated by individual tribal governments.

Klamath River Fall-Run Chinook Salmon
Adult Klamath River fall-run Chinook Salmon (KRFC) harvest allocations and natural spawning escapement goals are established by PFMC. The KRFC harvest allocation between tribal and non-tribal fisheries is based on court decisions and allocation agreements between the various fishery representatives.

PFMC Overfishing Review
KRFC stocks have been designated as “overfished” by PFMC. This designation is the result of not meeting conservation objectives for these stocks. Management objectives and criteria for KRFC are defined in the PFMC Salmon Fishery Management Plan (FMP). The threshold for overfished status of KRFC is a three-year geometric mean less than or equal to 30,525 natural area adult spawners. This overfished-threshold was met for KRFC during the 2015-2017 period. The 30,525 KRFC natural area adult spawners is considered the minimum stock size threshold, per the FMP. The KRFC adult natural area spawning escapement for 2024 was 24,032 natural area adult spawners, which is below the one-year conservation threshold of 40,700 natural area adult spawners. The most recent three-year geometric mean of 27,962 is still less than the required 40,700 natural area adult spawners conservation threshold, therefore the KRFC are still considered as an “overfished” stock.

Accordingly, the FMP outlines a process for preparing a “rebuilding plan” that includes assessment of the factors that led to the decline of the stock, including fishing, environmental factors, model errors, etc. The rebuilding plan includes recommendations to address conservation of KRFC, with the goal of achieving rebuilt status. Rebuilt status requires meeting a three-year geometric mean of 40,700 adult natural area KRFC spawner escapement. The plan developed by representatives of NMFS, PFMC, U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife (Department), and tribal entities, was submitted to PFMC in February 2019, adopted by PFMC in June 2019, and submitted to NMFS in August 2019. Forthcoming recommendations from the rebuilding plan may alter how KRFC

are managed in the future, including changing the in-river allocation number, and/or allocating less than the normal target number.

Klamath River Spring Chinook Salmon
The Klamath River Basin also supports Klamath River spring Chinook Salmon (KRSC). Naturally produced KRSC are both temporally and spatially separated from KRFC in most cases. Presently, KRSC stocks are not managed or allocated by PFMC. This in-river sport fishery is managed by general basin seasons, daily bag limit, and possession limit regulations. KRSC harvest is monitored on the Klamath River below the Highway 96 bridge at Weitchpec to the mouth of the Klamath River by creel survey. The upper Trinity River, upstream of Junction City, is monitored using tag returns from anglers.

KRFC Allocation Management
The PFMC allocation for the Klamath River Basin sport harvest is normally a minimum of 15 percent of the non-tribal PFMC harvest allocation of KRFC. Preseason stock projections of 2026 adult KRFC abundance will not be available from PFMC until March 2026. The 2026 basin allocation will be recommended by PFMC in April 2026. That allocation will inform the quota that the Department proposes to the Commission for adoption as a quota for the in-river sport harvest at the Commission's May 2026 teleconference meeting.

The Commission may adopt a KRFC in-river sport harvest quota that is different than the quota proposed by the Department or the PFMC 2026 allocation for that fishery. Commission modifications need to meet biological and fishery allocation goals specified in law or established in the FMP.

The annual KRFC in-river sport harvest quota is specified in subsection 7.40(b)(50)(D)1. The quota is split among four geographic areas with a subquota for each area, expressed as a percentage of the total in-river quota, specified in subsection 7.40(b)(50)(D)2. For angler convenience, the subquotas, expressed as the number of fish, are listed for the affected river segments in subsection 7.40(b)(50)(E).

The in-river sport subquota percentages are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the in-river sport quota;

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the in-river sport quota;

The spit area (within 100 yards of the channel through the sand spit formed at the Klamath River mouth) closes to all fishing after 15 percent of the total Klamath River Basin quota has been taken downstream of the Highway 101 bridge.

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the in-river sport quota; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the in-river sport fishery quota.

These geographic areas are based upon the historical distribution of angler effort to ensure equitable harvest of adult KRFC in the Klamath River and Trinity River. The subquota system requires the Department to monitor or assess angler harvest of adult KRFC in each geographic area. All areas are monitored on a real time basis, except for the Klamath River upstream of Weitchpec and in the Trinity

River. Due to funding and personnel reductions, the Department does not currently conduct real time harvest monitoring in the Klamath River upstream of the Weitchpec and in the Trinity River.

The Department has developed Harvest Predictor Models (HPM), which incorporate historic creel survey data from the Klamath River downstream of Iron Gate Dam to the confluence with the Pacific Ocean, and the Trinity River downstream of Lewiston Dam to the confluence with the Klamath River. Each HPM is driven by the positive relationship between KRFC harvested in the respective lower and upper subquota areas of the Klamath River and the Trinity River. The HPMs will be used by the Department to implement fishing closures to ensure that anglers do not exceed established subquota targets. Using this method, the upper Klamath River subquota area generally closes between 28-30 days after the lower Klamath River subquota is reached. Similarly, the upper Trinity River subquota area generally closes 45 days after the lower Klamath River subquota has been met. The Department also takes into consideration several other factors when implementing closure dates for subquota areas, including angler effort, KRFC run timing, weir counts, and ongoing recreational creel surveys performed by the Hoopa Valley Tribe in the lower Trinity River below Willow Creek.

Sport Fishery Management
The KRFC in-river sport harvest quota is divided into geographic areas, and harvest is monitored under real time subquota management. The KRSC in-river sport harvest is managed by general season, daily bag limit, and possession limit regulations.

The Department presently differentiates the two stocks by the following sport fish season in each sub-area:

Klamath River
July 1 through August 14 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth.

August 15 to December 31 – KRFC quota management.

Trinity River
July 1 through August 31 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Trinity River downstream of the Old Lewiston Bridge to the confluence with the South Fork Trinity River.

September 1 through December 31 – KRFC quota management.

Current regulations in subsections 7.40(b)(50)(E)2.a. through 2.e. specify bag limits for KRFC and KRSC stocks in the Klamath River. Current regulations in subsections 7.40(b)(50)(E)6.b., e., and f. specify bag limits for KRFC and KRSC stocks in the Trinity River. Current regulations in subsections 7.40(b)(50)(C)2.a. and 2.b. specify KRSC and KRFC possession limits, respectively.

Proposed Changes

KRFC Adult Stocks (Sport Fishery Quota Management)
Quota: For public notice requirements, the Department recommends the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows the PFMC and the Commission to make adjustments during the 2026 regulatory cycle.

Subquotas: The proposed subquotas for KRFC stocks are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the total quota equates to [0-11,492];

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the total quota equates to [0-33,800];

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the total quota equates to [0-11,154]; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the total quota equates to [0-11,154].

Seasons:

- Klamath River - August 15 through December 31
- Trinity River - September 1 through December 31

KRFC Option 1: Bag and Possession Limits

Because the PFMC recommendations are not known at this time, ranges are shown in [brackets] below of bag and possession limits which encompass historical quotas. All are proposed for the 2026 KRFC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-4] Chinook Salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until the subquota is met, then 0 fish over [20-24] inches total length.
- Possession limit - [0-12] Chinook Salmon of which no more than [0-4] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.

The final KRFC bag and possession limits will align with the final federal regulations to meet biological and fishery allocation goals specified in law or established in the FMP.

As in previous years, no retention of adult KRFC is proposed once the subquota has been met.

Size Limits

KRFC are managed based on adult quotas which is the maximum number of adult fish (age three and older) that can be harvested. In 2023, the Department moved away from the fixed standing cutoff size between grilse and adult Chinook Salmon of 23 inches total length to using a range between 20 to 24 inches total length as an annual option for cutoff size. This allows for annual variation in size cutoffs, as informed by previous year(s) data to manage the harvest of the adult KRFC quota more effectively. The Department is currently conducting a post season assessment of KRFC length and age data which will be used to help determine the proposed 2026 size cutoff. The 2026 proposed adult cutoff will be presented at the April 2026 Commission meeting.

KRFC Option 2: Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to and support any

federal action. This option prohibits all methods of targeting KRFC including catch and release fishing.

KRSC Sport Fishery
KRSC stocks are not managed or allocated by PFMC. This in-river sport fishery is managed by general basin seasons, daily bag limit, and possession limit regulations. The KRSC sport fishery has been incorporated into the annual Klamath sport fish rulemaking process to allow for adaptive management of stock status and the need to compensate for large-scale changes in fishery effort.

Seasons:

- Klamath River – July 1 through August 14
- Trinity River – July 1 through August 31

KRSC Option 1 Bag and Possession Limits

Ranges are shown in [brackets] below of bag and possession limits which encompass historical ranges. All are proposed for the 2026 KRSC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-1] Chinook Salmon
- Possession limit - [0-2] Chinook Salmon.

KRSC Option 2: Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRSC should the Department be concerned with stock status or predicts a large shift in effort due to widespread salmon closures in other areas of the state. In any year, should the PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to potential effort shift. This option prohibits all methods of targeting KRSC including catch and release fishing.

Other Changes for Clarity

Language referencing the size of an adult fish is removed from subsection (50)(E)2.e. in the second column as the size is already included in the following column as a range in the options provided. This change is necessary for consistency and clarity. Also, in subsections (50)(C)2., (50)(D)2.b., and (50)(E)2.e the words “to the mouth” have been added to clarify the lower boundary of this stretch of the Klamath River to be the mouth of the river as it meets the ocean.

Benefit of the Regulations

The benefits of the proposed regulations are conformance with federal fishery management goals, sustainable management of Klamath River Basin fish resources, health and welfare of California residents, and promotion of businesses that rely on salmon sport fishing in the Klamath River Basin.

Consistency and Compatibility with Existing Regulations

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to promulgate sport fishing regulations (Fish and Game Code sections 200, 205, 315, and 316.5). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor

incompatible with existing state regulations. Commission staff has searched the California Code of Regulations and has found no other state regulations related to sport fishing in the Klamath River Basin.

Proposed Regulatory Language

Section 7.40, Title 14, CCR, is amended to read:

§ 7.40. Alphabetical List of Hatchery Trout, Hatchery Steelhead, and Salmon Waters with Special Fishing Regulations.

. . . [No changes to subsections (a) through (b)(49)] . . .

(50) Klamath River Basin Regulations.

All anadromous Waters of the Klamath River Basin and Trinity River downstream of Lewiston Dam. This subsection applies only to waters of the Klamath River Basin that are accessible to anadromous salmonids. This subsection does not apply to waters of the Klamath River Basin that are inaccessible to anadromous salmon and trout, portions of the Trinity River system upstream of Lewiston Dam, and the Shasta River and tributaries upstream of Dwinnel Dam.

(A) Restrictions and Requirements.

1. Only barbless hooks may be used. (For definitions regarding legal hook types, hook gaps and rigging see Section 2.10.)
2. During closures to the take of adult salmon, it shall be unlawful to remove any adult Chinook Salmon from the water by any means.

3. See Section 1.74 for sport fish report card requirements.(B) General Area Closures.

1. No fishing is allowed within 750 feet of any department fish-counting weir.
2. No fishing is allowed from the Ishi Pishi Road bridge upstream to and including Ishi Pishi Falls from Aug. 15 through Dec. 31. Exception: members of the Karuk Tribe listed on the current Karuk Tribal Roll may fish at Ishi Pishi Falls using hand-held dip nets.
3. No fishing is allowed from Sep. 15 through Dec. 31 in the Klamath River within 500 feet of the mouths of the Salmon, Shasta and Scott rivers and Blue, Bogus, Fall and Shovel creeks.
4. No fishing is allowed from Jun. 15 through Sep. 14 in the Klamath River from 500 feet above the mouth of Blue Creek to 500 feet downstream of the mouth of Blue Creek.

(C) Klamath River Basin Possession Limits.

1. Trout Possession Limits.
   a. The Brown Trout possession limit is 20.
   b. The hatchery trout or hatchery steelhead possession limits are as follows:
      (i) Klamath River: 4 hatchery trout or hatchery steelhead.
      (ii) Trinity River: 4 hatchery trout or hatchery steelhead.
2. Chinook Salmon Possession Limits.

   KRSC Option 1: a. Klamath River downstream of the Highway 96 bridge at Weitchpec <u>to the mouth</u> from Jul. 1 through Aug. 14 and the Trinity River downstream of the Old Lewiston Bridge to the confluence of the South Fork Trinity River from Jul. 1 through Aug. 31: ~~Closed to the take and possession of Chinook Salmon.~~<u>[0-2]</u> Chinook Salmon.

   KRSC Option 2: a. Klamath River downstream of the Highway 96 bridge at Weitchpec <u>to the mouth</u> from Jul. 1 through Aug. 14 and the Trinity River downstream of the Old

Lewiston Bridge to the confluence of the South Fork Trinity River from Jul. 1 through Aug. 31: Closed to the take and possession of Chinook Salmon.

KRFC Option 1: b. Klamath River from Aug. 15 to Dec. 31 and Trinity River from Sep. 1 to Dec. 31: ~~Closed to the take and possession of Chinook Salmon.~~[0-12] Chinook Salmon. No more than [0-4] Chinook Salmon over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.

KRFC Option 2: b. Klamath River from Aug. 15 through Dec. 31 and Trinity River from Sep. 1 through Dec. 31: Closed to the take and possession of Chinook Salmon.

(D) Klamath River Basin Chinook Salmon Quotas.

Klamath River fall-run Chinook Salmon take is regulated using quotas. Accounting of the tribal and non-tribal harvest is closely monitored from Aug. 15 through Dec. 31 each year. Quota areas are noted in subsection 7.40(b)(50)(E) with "Fall-run Quota" in the *Open Season and Special Restrictions* column.

1. Quota for Entire Basin.

   The ~~2025~~2026 Klamath River Basin quota is ~~0~~[0-67,000] Klamath River fall-run Chinook Salmon. The department shall inform the commission, and the public via the news media, prior to any implementation of restrictions triggered by the quotas. (Note: A department status report on progress toward the quotas for the various river sections is updated weekly, and available by calling 1-800-564-6479.)

2. Subquota Percentages.

   a. The subquota for the Klamath River upstream of the Highway 96 bridge at Weitchpec and the Trinity River is 50% of the total Klamath River Basin quota.

      (i) The subquota for the Klamath River from ~~Lakeview Road bridge near Iron Gate~~ the California-Oregon border to the Highway 96 bridge at Weitchpec is 17% of the total Klamath River Basin quota.
      (ii) The subquota for the Trinity River main stem downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat is 16.5% of the total Klamath River Basin quota.
      (iii) The subquota for the Trinity River main stem downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River is 16.5% of the total Klamath River Basin quota.

   b. The subquota for the lower Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth is 50% of the total Klamath River Basin quota.

      (i) The Spit Area (within 100 yards of the channel through the sand spit formed at the Klamath River mouth) will close when 15% of the total Klamath River Basin quota is taken downstream of the Highway 101 bridge.

(E) Klamath River Basin Open Seasons and Bag Limits.

All anadromous waters of the Klamath River Basin are closed to all fishing all year except those areas listed in the following table. Bag limits are for trout and Chinook Salmon in combination unless otherwise specified.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
1. Bogus Creek and tributaries.	All anadromous portions of Bogus Creek. Closed to all fishing all year.	
2. Klamath River main stem from the California-Oregon state line to the mouth.		
a. Klamath River from California-Oregon state line to Copco Road bridge at Copco.	Nov. 1 through Feb. 28 and fourth Sat. in May through Aug. 31. Only artificial lures with barbless hooks may be used.	Closed to the take and possession of Chinook Salmon. 0 hatchery trout or hatchery steelhead**.
(i) Shovel Creek main stem downstream of barrier located approximately 2.75 miles upstream from Ager Beswick Road	All anadromous portions of tributaries. Closed to all fishing all year.	
b. Klamath River from Copco Road bridge at Copco to Lakeview Road bridge near Iron Gate.	Closed to all fishing all year.	
(i) Fall Creek downstream of barrier located approximately 1 mile upstream from Copco Road	All anadromous portions of tributaries. Closed to all fishing all year.	
(ii) Jenny Creek downstream of barrier located approximately 2 miles upstream from Copco Road	All anadromous portions of tributaries. Closed to all fishing all year.	
(iii) Scotch Creek main stem downstream of barrier located approximately 3/4 mile upstream from Copco Road	All anadromous portions of tributaries. Closed to all fishing all year.	

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
c. Klamath River from Lakeview Road Bridge near Iron Gate to Interstate 5 bridge.	Jan. 1 to Aug. 14.	2 hatchery trout or hatchery steelhead**.
	Fall-run Quota: ~~0~~ [0-11,492] Chinook Salmon Aug. 15 to Dec. 31, ~~2025~~2026. This is the cumulative quota for subsections 2.c. and 2.d.	~~Closed to the take and possession of Chinook Salmon.~~ **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon. 2 hatchery trout or hatchery steelhead**.
d. Klamath River from Interstate 5 bridge to the Highway 96 bridge at Weitchpec.	Jan. 1 through Aug. 14.	2 hatchery trout or hatchery steelhead**.
	Fall-run Quota: ~~0~~ [0-11,492] Chinook Salmon Aug. 15 through Dec. 31, ~~2025~~2026. This is the cumulative quota for subsections 2.c. and 2.d. Once the adult salmon quota for this area has been met, salmon fishing may continue but only salmon less than or equal to [20-24] inches total length may be kept.	~~Closed to the take and possession of Chinook Salmon.~~ **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon. 2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
e. Klamath River downstream of the Highway 96 bridge at Weitchpec.	Jan. 1 through Jun. 30.	2 hatchery trout or hatchery steelhead**.
	Jul. 1 through Aug. 14.	~~Closed to the take and possession of Chinook Salmon.~~ **KRSC Option 1**: [0-1] Chinook Salmon. **KRSC Option 2**: Closed to the take and possession of Chinook Salmon. 2 hatchery trout or hatchery steelhead**.
	Fall-run Quota: ~~0~~[0-33,800] Chinook Salmon Aug. 15 through Dec. 31, ~~2025~~2026. Once the adult salmon quota for this area has been met, salmon fishing may continue but only salmon less than or equal to [20-24] inches total length may be kept. Fall-run Quota Exception: Spit Area (within 100 yards of the channel through the sand spit formed at the Klamath River mouth). This area will be closed to all fishing after 15% of the total Klamath River Basin quota has been taken downstream of the Hwy 101 bridge.~~-~~All legally caught Chinook Salmon must be retained. Once the adult ~~(greater than 23 inches)~~ component of the total daily bag limit has been retained, anglers must cease fishing in the spit area.	~~Closed to the take and possession of Chinook Salmon~~. **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon 2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
3. Salmon River main stem, main stem of North Fork downstream of Sawyer's Bar bridge, and main stem of South Fork downstream of the confluence of the East Fork of the South Fork.	Nov. 1 through Feb. 28.	2 hatchery trout or hatchery steelhead**.
4. Scott River main stem downstream of the Fort Jones-Greenview bridge to the confluence with the Klamath River.	Fourth Sat. in May through Feb. 28.	2 hatchery trout or hatchery steelhead**.
5. Shasta River main stem downstream of the Interstate Highway 5 bridge north of Yreka to the confluence with the Klamath River.	Fourth Sat. in May through Aug. 31 and Nov. 16 through Feb. 28.	2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
6. Trinity River and tributaries.		
a. Trinity River main stem from 250 feet downstream of Lewiston Dam to the Old Lewiston Bridge.	Apr. 1 through Sep. 15. Only artificial flies with barbless hooks may be used.	2 hatchery trout or hatchery steelhead**.
b. Trinity River main stem downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat.	Jan. 1 through Jun. 30.	10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Jul. 1 through Aug. 31.	~~Closed to the take and possession of Chinook Salmon.~~ **KRSC Option 1**: [0-1] Chinook Salmon **KRSC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Fall-run Quota: ~~0~~[0-11,154] Chinook Salmon Sep. 1 through Dec. 31, ~~2025~~2026. Once the adult salmon quota for this area has been met, salmon fishing may continue but only salmon less than or equal to [20-24] inches total length may be kept.	~~Closed to the take and possession of Chinook Salmon.~~ **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
c. Trinity River main stem downstream of the Highway 299 West bridge at Cedar Flat to the Denny Road bridge at Hawkins Bar.	Jan. 1 through Jun. 30.	10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Jul. 1 through Aug. 31.	~~Closed to the take and possession of Chinook Salmon.~~ **KRSC Option 1**: [0-1] Chinook Salmon **KRSC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Sep. 1 through Dec. 31.	Closed to all fishing.
d. New River main stem downstream of the confluence of the East Fork to the confluence with the Trinity River.	Sep. 15 through Nov. 15. Only artificial lures with barbless hooks may be used.	2 hatchery trout or hatchery steelhead**.
e. Trinity River main stem downstream of the Denny Road bridge at Hawkins Bar to the mouth of the South Fork Trinity River.	Jan. 1 through Jun. 30.	10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Jul. 1 through Aug. 31.	~~Closed to the take and possession of Chinook Salmon.~~ **KRSC Option 1**: [0-1] Chinook Salmon **KRSC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
	Fall-run Quota: ~~0~~[0-11,154] Chinook Salmon Sep. 1 through Dec. 31, ~~2025~~2026. This is the cumulative quota for subsections 6.e. and 6.f. of this table. Once the adult salmon quota for this area has been met, salmon fishing may continue but only salmon less than or equal to [20-24] inches total length may be kept.	~~Closed to the take and possession of Chinook Salmon.~~ **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
f. Trinity River main stem downstream of the mouth of the South Fork Trinity River to the confluence with the Klamath River.	Jan. 1 through Aug. 31.	10 Brown Trout. 2 hatchery trout or hatchery steelhead**.
	Fall-run Quota: ~~0~~[0-11,154] Chinook Salmon Sep. 1 through Dec. 31, ~~2025~~2026. This is the cumulative quota for subsections 6.e. and 6.f. of this table. Once the adult salmon quota for this area has been met, salmon fishing may continue but only salmon less than or equal to [20-24] inches total length may be kept.	~~Closed to the take and possession of Chinook Salmon.~~ **KRFC Option 1**: [0-4] Chinook Salmon - no more than [0-4] fish over [20-24] inches total length until subquota is met, then 0 fish over [20-24] inches total length. **KRFC Option 2**: Closed to the take and possession of Chinook Salmon. 10 Brown Trout. 2 hatchery trout or hatchery steelhead**.

Body of Water	*Open Season and Special Restrictions*	*Daily Bag Limit*
g. Hayfork Creek main stem downstream of the Highway 3 bridge in Hayfork to the confluence with the South Fork Trinity River.	Nov. 1 through Mar. 31. Only artificial lures with barbless hooks may be used.	2 hatchery trout or hatchery steelhead**.
h. South Fork Trinity River downstream of the confluence with the East Fork of the South Fork Trinity River to the South Fork Trinity River bridge by Hyampom.	Nov. 1 through Mar. 31. Only artificial lures with barbless hooks may be used.	2 hatchery trout or hatchery steelhead**.
i. South Fork Trinity River downstream of the South Fork Trinity River bridge at Hyampom to the confluence with the Trinity River.	Nov. 1 through Dec. 31.	Closed to the take and possession of Chinook Salmon. 2 hatchery trout or hatchery steelhead**.
	Jan. 1 through Mar. 31.	2 hatchery trout or hatchery steelhead**.

. . . [No changes to subsections (b)(51) through (b)(123)] . . .

* Wild Chinook Salmon are those not showing a healed adipose fin clip and not showing a healed left ventral fin clip.

**Hatchery trout or steelhead in anadromous waters are those showing a healed adipose fin clip (adipose fin is absent). Unless otherwise provided, all other trout and steelhead must be immediately released. Wild trout or steelhead are those not showing a healed adipose fin clip (adipose fin is present).

Note: Authority cited: Sections 200, 205, 265, 270, 315, 316.5, 399 and 2084, Fish and Game Code. Reference: Sections 200, 205, 265, 270, 316.5 and 2084, Fish and Game Code.

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT

DEPARTMENT NAME	CONTACT PERSON	EMAIL ADDRESS	TELEPHONE NUMBER
California Fish and Game Commission	David Thesell	fgc@fgc.ca.gov	916-201-6201

DESCRIPTIVE TITLE FROM NOTICE REGISTER OR FORM 400	NOTICE FILE NUMBER
Amend Section 7.40 Title 14, CCR, Re: Klamath River Basin Sport Fishing	Z

A. ESTIMATED PRIVATE SECTOR COST IMPACTS *Include calculations and assumptions in the rulemaking record.*

1. Check the appropriate box(es) below to indicate whether this regulation:

- [X] a. Impacts business and/or employees
- [X] b. Impacts small businesses
- [X] c. Impacts jobs or occupations
- [ ] d. Impacts California competitiveness
- [ ] e. Imposes reporting requirements
- [ ] f. Imposes prescriptive instead of performance
- [X] g. Impacts individuals
- [ ] h. None of the above (Explain below):

If any box in Items 1 a through g is checked, complete this Economic Impact Statement.
If box in Item 1.h. is checked, complete the Fiscal Impact Statement as appropriate.

2. The California Fish and Game Commission (Agency/Department) estimates that the economic impact of this regulation (which includes the fiscal impact) is:

- [X] Below $10 million
- [ ] Between $10 and $25 million
- [ ] Between $25 and $50 million
- [ ] Over $50 million *[If the economic impact is over $50 million, agencies are required to submit a Standardized Regulatory Impact Assessment as specified in Government Code Section 11346.3(c)]*

3. Enter the total number of businesses impacted: 30-50

Describe the types of businesses (Include nonprofits): Fishing boat owners, tackle stores, guides, food, fuel, lodging, campgrounds

Enter the number or percentage of total businesses impacted that are small businesses: 80%

4. Enter the number of businesses that will be created: 0 eliminated: 0

Explain: Anticipated changes in fishing activity are not expected to be extensive enough to induce business loss or creation

5. Indicate the geographic extent of impacts:
- [ ] Statewide
- [X] Local or regional (List areas): Siskiyou, Trinity, Del Norte, and Humboldt counties

6. Enter the number of jobs created: 0-28 and eliminated: 0

Describe the types of jobs or occupations impacted: Fishing guides, retail sales clerks in sport fishing-serving businesses, such as: tackle stores, food, fuel, lodging, and camping vendors.

7. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? [ ] YES [X] NO

If YES, explain briefly:

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
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STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

B. ESTIMATED COSTS *Include calculations and assumptions in the rulemaking record.*

1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? $ 0

   a. Initial costs for a small business: $ 0 Annual ongoing costs: $ 0 Years: 1

   b. Initial costs for a typical business: $ 0 Annual ongoing costs: $ 0 Years: 1

   c. Initial costs for an individual: $ 0 Annual ongoing costs: $ 0 Years: 1

   d. Describe other economic costs that may occur: N/A. The action will set Klamath River fall-run Chinook salmon (KRFC) and Klamath River spring-run Chinook salmon (KRSC) bag and possession limits with no new compliance costs. See addendum.

2. If multiple industries are impacted, enter the share of total costs for each industry: N/A

3. If the regulation imposes reporting requirements, enter the annual costs a typical business may incur to comply with these requirements. *Include the dollar costs to do programming, record keeping, reporting, and other paperwork, whether or not the paperwork must be submitted.* $ N/A

4. Will this regulation directly impact housing costs? ☐ YES ☐ NO

   If YES, enter the annual dollar cost per housing unit: $

   Number of units:

5. Are there comparable Federal regulations? ☐ YES ☒ NO

   Explain the need for State regulation given the existence or absence of Federal regulations: The Pacific Fishery Management Council annually recommends fishery allocations; state regulations are adopted for consistency with federal actions.

   Enter any additional costs to businesses and/or individuals that may be due to State - Federal differences: $ 0

C. ESTIMATED BENEFITS *Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. Briefly summarize the benefits of the regulation, which may include among others, the health and welfare of California residents, worker safety and the State's environment: This temporary closure is only taken to ensure the continued sustainability of the salmon and other sport fisheries that benefit sport anglers, and the area businesses involved in sport fishing activities. See addendum

2. Are the benefits the result of: ☐ specific statutory requirements, or ☒ goals developed by the agency based on broad statutory authority?

   Explain: Statute provides Fish & Game Commission the authority to establish sport fishing regulations (F&G sec. 200, 205)

3. What are the total statewide benefits from this regulation over its lifetime? $ 0($2.42M if open; see add.)

4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation: Any changes in fishing activity levels are not expected to be sufficient enough to induce the expansion of businesses currently doing business within the State. See addendum.

D. ALTERNATIVES TO THE REGULATION *Include calculations and assumptions in the rulemaking record. Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. List alternatives considered and describe them below. If no alternatives were considered, explain why not: No alternatives were identified that would have the same desired regulatory effect. See initial statement of reasons and the addendum.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT (CONTINUED)

2. Summarize the total statewide costs and benefits from this regulation and each alternative considered:

Regulation:	Benefit: $	2.42M	Cost: $	1.3M (closure)*
Alternative 1:	Benefit: $	N/A	Cost: $	N/A
Alternative 2:	Benefit: $	N/A	Cost: $	N/A

3. Briefly discuss any quantification issues that are relevant to a comparison of estimated costs and benefits for this regulation or alternatives: Benefit=typical recreational fishing impact. *Costs=temporary loss of KRFC and KRSC fishing expenditures to avoid long-run overfishing costs. However, prolonged closure has made the "costs" the new baseline equilibrium, see addendum.

4. Rulemaking law requires agencies to consider performance standards as an alternative, if a regulation mandates the use of specific technologies or equipment, or prescribes specific actions or procedures. Were performance standards considered to lower compliance costs? ☐ YES ☒ NO

Explain: Fisheries management regulations traditionally involve setting harvest quotas, seasons, and bag and possession limits.

E. MAJOR REGULATIONS *Include calculations and assumptions in the rulemaking record.*

California Environmental Protection Agency (Cal/EPA) boards, offices and departments are required to submit the following (per Health and Safety Code section 57005). Otherwise, skip to E4.

1. Will the estimated costs of this regulation to California business enterprises **exceed $10 million**? ☐ YES ☐ NO

If YES, complete E2. and E3
If NO, skip to E4

2. Briefly describe each alternative, or combination of alternatives, for which a cost-effectiveness analysis was performed:

Alternative 1:

Alternative 2:

(Attach additional pages for other alternatives)

3. For the regulation, and each alternative just described, enter the estimated total cost and overall cost-effectiveness ratio:

Regulation:	Total Cost $		Cost-effectiveness ratio: $	
Alternative 1:	Total Cost $		Cost-effectiveness ratio: $	
Alternative 2:	Total Cost $		Cost-effectiveness ratio: $	

4. Will the regulation subject to OAL review have an estimated economic impact to business enterprises and individuals located in or doing business in California exceeding $50 million in any 12-month period between the date the major regulation is estimated to be filed with the Secretary of State through12 months after the major regulation is estimated to be fully implemented?

☐ YES ☒ NO

If YES, agencies are required to submit a Standardized Regulatory Impact Assessment (SRIA) as specified in Government Code Section 11346.3(c) and to include the SRIA in the Initial Statement of Reasons.

5. Briefly describe the following:

The increase or decrease of investment in the State: No effect on the level of investment in the State.

The incentive for innovation in products, materials or processes: No effect on the incentive for innovation in products, materials, or processes.

The benefits of the regulations, including, but not limited to, benefits to the health, safety, and welfare of California residents, worker safety, and the state's environment and quality of life, among any other benefits identified by the agency: Benefits to the state's environment and quality of life, recreational angling, and the businesses that serve them.

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STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT
(REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT

A. FISCAL EFFECT ON LOCAL GOVERNMENT *Indicate appropriate boxes 1 through 6 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year which are reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

☐ a. Funding provided in _____

Budget Act of _____ or Chapter _____ , Statutes of _____

☐ b. Funding will be requested in the Governor's Budget Act of _____

Fiscal Year: _____

☐ 2. Additional expenditures in the current State Fiscal Year which are NOT reimbursable by the State. (Approximate)
(Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ _____

Check reason(s) this regulation is not reimbursable and provide the appropriate information:

☐ a. Implements the Federal mandate contained in _____

☐ b. Implements the court mandate set forth by the _____ Court.

Case of: _____ vs. _____

☐ c. Implements a mandate of the people of this State expressed in their approval of Proposition No. _____

Date of Election: _____

☐ d. Issued only in response to a specific request from affected local entity(s).

Local entity(s) affected: _____

_____

☐ e. Will be fully financed from the fees, revenue, etc. from: _____

Authorized by Section: _____ of the _____ Code;

☐ f. Provides for savings to each affected unit of local government which will, at a minimum, offset any additional costs to each;

☐ g. Creates, eliminates, or changes the penalty for a new crime or infraction contained in _____

☐ 3. Annual Savings. (approximate)

$ _____

☐ 4. No additional costs or savings. This regulation makes only technical, non-substantive or clarifying changes to current law regulations.

☐ 5. No fiscal impact exists. This regulation does not affect any local entity or program.

☒ 6. Other. Explain The adopted closure may result in reduced local sales tax ($11,949 to $17,070) and reduced transient occupancy tax ($20,680 to $29,543). See addendum.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT (REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT (CONTINUED)

B. FISCAL EFFECT ON STATE GOVERNMENT *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

It is anticipated that State agencies will:

☐ a. Absorb these additional costs within their existing budgets and resources.

☐ b. Increase the currently authorized budget level for the _____ Fiscal Year

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☐ 3. No fiscal impact exists. This regulation does not affect any State agency or program.

☒ 4. Other. Explain With the closure, CA Department of Fish and Wildlife may see decline in salmon report card revenue (~$105k). State sales tax may decline ($69,304 to $99,006) in the unlikely event that no alternate state fishing or recreation trips taken. See addendum

C. FISCAL EFFECT ON FEDERAL FUNDING OF STATE PROGRAMS *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ _____

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ _____

☒ 3. No fiscal impact exists. This regulation does not affect any federally funded State agency or program.

☐ 4. Other. Explain _____

FISCAL OFFICER SIGNATURE	DATE
DocuSigned by: Dan Reagan	3/19/2026

The signature attests that the agency has completed the STD. 399 according to the instructions in SAM sections 6601-6616, and understands the impacts of the proposed rulemaking. State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization.

AGENCY SECRETARY	DATE
Melissa A. Miller-Henson Bryan Cash 4/5/2026	3/18/2026

Finance approval and signature is required when SAM sections 6601-6616 require completion of Fiscal Impact Statement in the STD. 399.

DEPARTMENT OF FINANCE PROGRAM BUDGET MANAGER	DATE

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STD. 399 Addendum

Amend Subsection (b)(50) of Section 7.40, Title 14, California Code of Regulations Regarding Klamath River Basin Sport Fishing

Background

Amendments to Section 7.40, Title 14, California Code of Regulations, adopted by the California Fish and Game Commission (Commission) every year, sets the 2026 Klamath River Basin salmon sport fishing regulations for consistency with the Pacific Fishery Management Council (PFMC) recommendation for the Klamath River fall-run Chinook salmon (KRFC) allocation; the Commission will also adopt regulations for Klamath River spring Chinook salmon (KRSC). The 2022 sport fishing season was the most recent season without a full closure, which represents for purposes of this analysis, the baseline for comparison for the 2026 anticipated impacts.

KRFC Adult Stocks

Preserving Klamath River Basin salmon stocks is vital for the ongoing success of Klamath River Basin businesses, which provide goods and services related to fishing. Scientifically-based KRFC allocations are necessary for the continued conservation of the resource and, therefore, preventing adverse economic impacts.

The Klamath River Basin in-river sport salmon fishery is managed using adult quotas, which is the maximum number of adult fish that can be harvested. For the 2026 regulatory cycle, the Department recommends that the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows PFMC and Commission to make adjustments during the 2026 regulatory cycle.

The Department also recommends a size limit cutoff range between grilse and adult Chinook Salmon of 20 to 24 inches total length for adult salmon to allow for annual variation in size cut-offs, as informed by previous year(s) data to manage the harvest of the adult KRFC quota more effectively. The Department conducts a post-season assessment of KRFC length and age data which will be used to help determine the proposed 2026 size cutoff, and will be presented at the April 2026 Commission meeting. Based on creel surveys over seasons in which grilse size had been changed, change in size specification for grilse is not anticipated to impact the number or length of angler trips and, thus, expenditures in the fishery areas.

Under the 2022 season regulations, the quota was 2,119 KRFC and the cutoff for adult salmon was 23 inches total length (ages three through five). Salmon less than or equal to 24 inches total length were defined as grilse salmon (age two) for the 2022 season. Once the area quota had been attained for the 2022 season, the fishery for adult-sized KRFC was closed, but angling was still allowed for grilse salmon. Regardless of limitations on salmon fishing, angling was still allowed for other sport fish species (e.g. hatchery trout or steelhead) under state regulations.

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KRSC Adult Stocks

The KRSC recreational sport fishery is managed by the Department outside the PFMC process, but had been closed multiple times in the recent past through the emergency rulemaking process. The current stock status and the need to compensate for large-scale changes in fishery effort have necessitated the Department to consider regulations of this fishery annually. As a result, the management of KRSC is now incorporated into the annual Klamath sport fish rulemaking process.

Assessment

Based on a 2011 National Marine Fisheries Service (NMFS) report (*In-River Sport Fishing Economics of the Klamath River*), and adding a 33 percent increase to account for the Trinity River[1], non-resident (outside the immediate locale) salmon or steelhead angler average expenditures are estimated to be $136.56 (2025$) per angler day (for lodging, food, gasoline, fishing gear, boat fuel, and guide fees). The projection does not distinguish between spring and fall-runs; however, the in-river harvest is almost exclusively fall-run.

Local resident average expenditures per angler day are estimated to be 60 percent less (markedly reduced lodging, gasoline, and food expenditures), or approximately $54.62 per angler day. Any decreases to expenditures by resident anglers associated with reduced fishing opportunities may be offset by increased expenditures on other locally purchased goods and services – with no net change in local economic activity. Thus, the economic impact analysis focuses on nonresident angler expenditures, which represents new money that serves to stimulate the local economy.

Creel surveys in the Department's Northern Region (Del Norte, Humboldt, Lassen, Mendocino, Modoc, Shasta, Siskiyou, Tehama and Trinity counties) reveal that local resident (Eureka and Crescent City) anglers comprise about 22 percent of Klamath River Basin anglers, meaning that a majority (78%) of anglers come from outside the immediate locale.

In a representative non-closure year, the total non-resident angler contribution to the Klamath River Basin (including the Trinity River) is estimated to be $1,365,600 (2025$) in direct expenditures from an assumed 10,000 angler days, resulting in about $2,415,682 (2025$) in total economic output that supports an estimated 28 jobs throughout the state. This is a conservative estimate of total economic impact as it counts only non-resident angler expenditures. The impact of non-resident angler direct expenditures on labor income, total economic output, and jobs is shown in Table 1.

Table 1. Klamath River Basin* Salmon & Steelhead Sportfish Economic Impact: 2024

	Salmon	**Steelhead**	***Total Impact***
Expenditures	$1,365,600	$3,730	$1,380,464

[1] The NMFS study excluded the Trinity River, the largest tributary to the Klamath River. The Trinity River is allocated 33 percent of the KRFC total quota.

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Labor Income	$764,144	$2,087	$766,231
Total Economic Impact	$2,415,682	$6,598	$2,422,280
Total Jobs Impact	28.1	0.1	28.2

Sources: Department Fisheries Branch Northern Region Creel 2022 surveys, In-River Sport Fishing Economics Technical Report*, National Oceanographic and Atmospheric Administration, National Marine Fisheries Service, September 2011. * Lower Klamath and Trinity Rivers. Adjusted for 2025$ from 2022$.*

Economic Impact Projections

Using adjusted non-resident Klamath River Basin salmon and steelhead sport fishing economic impacts from 2022 (Table 1) as a baseline, the initial economic and fiscal impact analysis evaluated three options: Adopting regulations for 100 percent of the proposed 2026 KRFC quota (0-67,000), 50 percent of the proposed 2026 KRFC quota, and a KRFC closure or 0 percent of the proposed adult KRFC quota and KRSC closure. Additionally, the in-river harvest is almost exclusively for KRFC, therefore no significant impacts are anticipated from the proposed changes to the KRSC regulations. If the 2026 KRFC quota remains similar to the KRFC quotas allocated in previous years, then local economic impacts are expected to be beneficial as anglers return to the fishery. Neither scenario is expected to directly affect the ability of California businesses to compete with businesses in other states.

Economic Impact Statement

Section A. Estimated Private Sector Cost Impacts

Question 4. Number of businesses that will be created or eliminated.

Projection 1: 100 percent of the proposed adult KRFC quota range, which realistically includes the KRSC quota if that fishery is to reopen (similar to KRFC and KRSC Option 1 described in the Initial Statement of Reasons (ISOR)). The Commission does not anticipate any adverse impacts on the creation of new businesses or the elimination of existing businesses. The quota would not decrease effort nor curtail the number of visitors and thus probable visitor expenditures in the fishery's areas, as it would be an increase from the 2025 complete closure.

Projection 2: 50 percent of the proposed adult KRFC quota. In comparison to Projection 1, the Commission anticipates a decline in visits to the fishery areas of less than 50 percent due to the continued sport fishing allowed for other species and grilse KRFC. The decline in visits may result in some decline in business activity, but the Commission does not anticipate any impacts on the creation of new businesses or the elimination of existing businesses directly related to fishing activities, as this would represent a net increase in visits from the 2025 complete closure of the fishery. However, with less effort being expended on salmon fishing, the possibility of alternative activities and the growth of businesses to serve those activities exists.

Projection 3: A KRFC closure or 0 percent of the proposed adult KRFC quota and KRSC closure (similar to KRFC and KRSC Option 2 described in the ISOR). The Commission anticipates a decline in regional spending and thus reduced revenues to the approximately 30

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to 50 businesses that directly and indirectly serve sport fishing activities as compared to Projection 1, with unknown impacts on the creation of new business or the elimination of existing businesses. However, adverse impacts may be mitigated by the continued opportunity to harvest other sport fish and the potential for the substitution of salmon fishing with other recreational activities. Additionally, the long-term intent of the regulatory action is to increase sustainability in fishable salmon stocks and, consequently, the long-term viability of these same small businesses. Finally, it should be noted that Projection 3 is the current state of the fishery since the closure began in 2023.

Question 6. Number of jobs that will be created or eliminated.

Projection 1: 100 percent of the proposed adult KRFC quota range, which realistically includes the KRSC quota if that fishery is to reopen. The Commission does not anticipate any impact on the creation or elimination of jobs, as the quota would not decrease effort nor curtail the number of visitors and thus probable visitor expenditures in the fishery's areas.

Projection 2: 50 percent of the proposed adult KRFC quota. The Commission anticipates some impact on the creation or elimination of jobs, which may be partially offset by the potential for continued sport fishing allowed for other sport fish and grilse KRFC. A 50 percent salmon catch limit reduction, in comparison to Projection 1, will likely reduce visitor spending by slightly less than 50 percent, given price elasticities of demand for salmon fishing activity of less than one. As the "price" of fishing per unit catch increases, the demand for fishing trips declines by a lesser extent, particularly in the short run. While difficult to predict, job losses associated with a 50 percent reduction in the adult KRFC catch limit would be expected to be less than half of the 28 estimated total jobs supported by salmon angler visits based on the historical averages seen in Table 1 (i.e. fewer than 14 jobs) if a closure occurred after a previously open season. However, it should be noted that these job losses may have already occurred during the current closure period that began after the 2022 season as there has been sufficient time for adjustment lags to have set in from changed angler behavior, so the change from baseline closure conditions could potentially result in a net gain of 14 jobs added due to the fishery reopening. Additionally, with less effort being expended on salmon fishing the possibility of alternative activities and the growth of businesses to serve those activities exists.

Projection 3: A KRFC closure or 0 percent of the proposed adult KRFC quota and KRSC closure. The Commission anticipates less than 50 percent reduction in fishery-related jobs, as compared to Projection 1. As mentioned above, this is currently the state of the fishery since the closure in 2023, and the continued allowance of sportfishing for other species may mitigate potential job losses.

Closures on the take of all KRFC were instituted in 2017, 2023, 2024, and 2025, while closures for the KRSC were instituted in 2023 through 2025 - only steelhead could be legally harvested during those years. The 2017 closure resulted in nearly a 50 percent drop in angler days. However, job creation or elimination tends to lag in response to short-term changes in consumer demand. Thus, the potential impacts of a 2026 closure on the take of adult KRFC and KRSC are estimated to result in the loss of less than 14 jobs due to adjustment lags, and the continued sport fishing allowed for other species.

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Section B. Estimated Costs

Question 1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime?

$0. The regulations seek to manage the Klamath River Basin fall-run Chinook Salmon fishery with no new compliance costs. The adopted bag and possession limits do not prescribe any particular equipment or methods**.**

Section C. Estimated Benefits

Question 1. Briefly summarize the benefits of the regulation.

The Commission anticipates benefits to the health and welfare of California residents. Conserving fish populations for the Klamath River Basin salmon sport fishery and preserving other existing sport fisheries encourages a healthy outdoor activity and the consumption of nutritious food for anglers. Sport fishing also contributes to the increased mental health of its practitioners, as fishing is a hobby and form of relaxation for many. Sport fishing also provides opportunities for multi-generational family activities and promotes respect for California's environment by the future stewards of California's natural resources.

The Commission does not anticipate benefits to worker safety because the proposed regulations will not impact working conditions.

The Commission anticipates benefits to the environment in the sustainable management of Klamath River Basin salmonid resources. It is the policy of this State to encourage the conservation, maintenance, and utilization of the living resources of the ocean and other waters under the jurisdiction and influence of the State for the benefit of all the citizens of the State and to promote the development of local fisheries and distant water fisheries based in California in harmony with international law, respecting fishing and the conservation of the living resources of the ocean and other waters under the jurisdiction and influence of the State. The objectives of this policy include, but are not limited to, the maintenance of sufficient populations of all species of aquatic organisms to ensure their continued existence, and the maintenance of a sufficient resource to support a reasonable sport use. Adoption of scientifically based Klamath River Basin salmon seasons, size limits, and bag and possession limits are intended to provide for the maintenance of sufficient populations of salmon to ensure their continued existence.

Consistency with federal fishery management goals: California's salmon sport fishing regulations need to align with the new federal regulations to achieve optimum yield in California. PFMC annually reviews the status of west coast salmon populations. As part of the review process, PFMC recommends west coast adult salmon fisheries regulations aimed at meeting biological and fishery allocation goals specified in law or established in the PFMC Salmon Fishery Management Plan. The recommendations coordinate west coast management of sport and commercial ocean salmon fisheries off the coasts of Washington, Oregon, and California, and California inland salmon sport fisheries. The recommendations are subsequently implemented as ocean fishing regulations by NMFS, and as salmon sport fishing regulations for California marine and inland waters by the Commission.

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Question 3. What are the total statewide benefits from this regulation over its lifetime?

Approximately $2.42 million annually.

A typical non-closure season for the Klamath River Basin (including the Trinity River) experiences about 10,082 non-resident sport salmon angler days in which anglers contribute an estimated $1.365 million (2025$) in direct expenditures to California businesses; this expenditure is received by area businesses that spend a share on inputs and payroll. As employees receive income, their household spending again circulates in the local economy and statewide. These multiplier effects result in an estimated total economic impact of about $2.42 million (2025$) and support up to 28 jobs (see Table 1).

The total economic impact of continued levels of typical, non-closure activity throughout the Klamath River Basin fishery is reported as the "benefit" of this regulation, while the incremental change introduced by this adopted closure is reported as the "costs." The costs are the adverse impact of the adopted complete KRFC and KRSC closure and are estimated to be $1,338,009 in reduced sportfishing expenditures (see Table 1). These estimated losses of spending assume that the fishers who typically pursue KRFC salmon do not pursue other sportfish or other Klamath Basin recreation. Thus, they are conservative estimates with no mitigating substitutions toward alternative visitor activities, such as fishing for steelhead, kayaking, boating, or wildlife watching. Curiosity about the Klamath River Basin dam removals, watershed restoration, Native American festivals, whitewater rafting, or other activities could increase out-of-town visitors and local expenditures whether salmon are running or not. The long-term intent of the proposed regulatory action is to increase sustainability of fishable salmon stocks and consequently, promote the long-term viability of businesses that support sportfishing.

Question 4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation.

Projection 1: 100 percent of the proposed adult KRFC catch limit. The Commission does not anticipate any impacts on the expansion of businesses in California as the quota would not decrease effort nor curtail the number of visitors and thus probable visitor expenditures in the fisheries areas.

Projection 2: 50 percent of the proposed adult KRFC catch limit. The Commission does not anticipate any impacts on the expansion of businesses currently doing business within the State. As compared to the economic impacts of salmon angler visits (Table 1), decreases in expenditures by resident anglers associated with reduced fishing opportunities may be offset by increased expenditures on other locally purchased goods and services – with no net change in local economic activity. For non-resident anglers, however, decreases in local expenditures associated with decreases in local fishing opportunities may result in increases in other expenditures outside the Klamath River Basin area.

Projection 3: A KRFC closure or 0 percent of the proposed adult KRFC catch limit, representing the current state of the fishery since the closure in 2023. The Commission does not anticipate any expansion of businesses in California. As compared to the economic impacts of salmon angler visits (Table 1), decreases in expenditures by anglers associated

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with reduced fishing opportunities may be partially offset by increased expenditures on other locally purchased goods and services as visitors fish for other sport fish or substitute salmon fishing with other recreational activities.

Section D. Alternatives to the Regulation

Question 1. List all alternatives considered and describe them below. If no alternatives were considered, explain why not:

Alternative 1: No other alternatives were identified by or brought to the attention of the Commission that would have the same desired regulatory effect.

The use of more liberal regulations for the KRFC quota, and for KRSC and KRFC bag limits, possession limits, and minimum adult salmon size would be less desirable than those proposed. More liberal regulations for KRFC bag limits, possession limits, and minimum adult salmon size could create the risk of an intense fishery in which the quota is reached or exceeded in a very short time. Reaching the quota in a very short time could be damaging to the local economy and exceeding the quota or setting a higher quota could damage KRFC stocks. More liberal regulations for KRSC bag limits, possession limits, and minimum adult salmon size could create the risk could damage KRSC stocks.

Alternative 2: The “no change” alternative would leave the existing salmon fishing closure in the Klamath River Basin in place; this would not allow the Commission to re-open salmon fishing the Klamath River Basin in 2026 should PFMC preseason stock projections of adult KRFC be sufficient to allow in-river sport fishing. The no change alternative would also not allow the Commission to provide protection to KRSC in tandem with KRFC.

Fiscal Impact Statement

Section A. Fiscal Effect on Local Government

Answer: 6. Other. With a closure of the KRFC and KRSC fisheries, there is a potential for drops in local sales tax (~ $11,949 to $17,070) and transient occupancy tax (~ $20,680 to $29,543) revenue to local governments in the north coast fishery areas. These estimates are the worst case, in that the assumption is that the drop in salmon fishing opportunity will cause the historic number of salmon anglers to not visit the Klamath River Basin for any other outdoor activity.

a. Local Sales Tax

The potential closure of the KRFC in-river recreational fishery was evaluated as to what extent it would impact visits to the fishery area and length of stay in the area. Fishing visits involve expenditures in the retail, food and accommodations, automotive service and fuel, sporting equipment sales/rent/lease, and recreational services sectors. The direct expenditures generate local sales and transient occupancy taxes for the fishery area local governments. The California Department of Tax and Fee Administration reports city and county sales tax rates. Local sales tax rates in Del Norte, Humboldt, Siskiyou and Trinity counties range from 1.0% to 1.5% (State sales tax is 7.25%). Reduced spending due to reduced numbers of visits and reductions in the length of stay resulting from a complete closure of the KRFC fishery

(Projection 3) could result in local sales tax revenue losses that range from $11,949 to $17,070 over the season.

b. Transient Occupancy Tax (TOT)

Nonresident fishery participants are those who travel a greater distance to the fishery area and are more likely to stay overnight in the area. Overnight stays are often at private campgrounds, motels, and hotels, all of which collect TOTs. County treasurer tax collectors report the county TOTs, with rates in Del Norte, Humboldt, Siskiyou and Trinity counties ranging from 5% to 10%; RV parks may have rates as low as 2%. The projected loss in overnight stays ranges from 7,000 to 10,000 fewer nights in campgrounds, cabins, and hotels which could result in estimated losses in local TOT revenues to local governments from $20,680 to $29,543 over the season.

Section B. Fiscal Effect on State Government

Answer: 4. Other. There would be no fiscal impact to any state agency or program if 50 to 100 percent of the proposed adult KRFC adult catch limit is adopted. However, if a closure to the KRFC fishery adopted, the Commission anticipates impacts to license revenue (~$105,225) to the Department as North Coast Salmon Report Card sales are anticipated to fall below historic levels as seen in 2016-2022. The North Coast Salmon Report Card is required for any person taking salmon in the Smith River or Klamath and Trinity rivers.State sales tax revenue may decline by about $69,304 to $99,006 during a closure period.

a. Department Revenue

The seven-year (2016-2022) average number of report cards sold is 18,411, with 18,254 sold in 2022, the most recent year with no closure. Report card sales from 2025 with the closure was 4,028, representing a shortfall of 12,012 cards from the 2016-2022 average. The expected revenue generated from the 2026 card fee is $8.76; if the shortfall in cards for the 2026 season remains at a decline of 12,012 cards from the 2016-2022 average, the closure would result in a $105,225.12 decline in Department revenue. Department revenues for the next two fiscal years are unknown because the regulations adopted this year may not be in effect in the years ahead.

The Department has determined that the proposed salmon regulations will not affect the already existing level of monitoring and enforcement activities.

No other state agencies would be affected by this regulatory action.

b. State Sales Tax

There would be no fiscal impact to any state sales tax revenue if 50 to 100 percent of the 2022 adult KRFC catch limit is adopted. However, should a closure to the KRFC and KRSC fisheries be adopted (Projection 3), state sales tax revenue may decline by an estimated $69,304 to $99,006 during the closure period, as compared to 2022. This estimate is the worst case in that it assumes the drop in salmon fishing opportunity will cause the historic number of salmon anglers to not visit the Klamath River Basin for any other outdoor activity, such as

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kayaking, hiking, fishing for steelhead, or other activities, nor spend discretionary dollars (i.e., vacation, recreational) in any other part of the state.

Section C. Fiscal Effect on Federal Funding of State Programs

Answer: 3. No fiscal impact.

The proposed regulatory action will not have the potential for a fiscal effect on the federal funding of state programs.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

MEMORANDUM

Date: May 2026

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

From: Meghan Hertel, Director

Subject: Submittal of Pre-Adoption Statement of Reasons to Amend Section 7.40, Title 14, California Code of Regulations, Re: Klamath River Basin Sport Fishing Regulations 2026

Please find attached the Pre-Adoption Statement of Reasons (PSOR) for the 2026 Klamath River Basin sport fishing regulations. The PSOR includes the California Department of Fish and Wildlife's (Department) recommendation of a Klamath River fall-run Chinook (KRFC) quota of 3,248 adult fish. This translates to a daily bag limit of 2 fish, with no more than one adult over 23 inches total length and a possession limit of 6 fish, with no more than 3 fish over 23 inches total length. For subsection 7.40(b)(50)(E) 2.c., on the Klamath River main stem above the I-5 bridge, the Department recommended that the KRFC fishery remain closed for the 2026 season. The Department also recommended a Klamath River spring Chinook (KRSC) daily bag limit of 1 fish and possession limit of 2 fish for any size KRSC. The recommendations reflect as Option 1 for KRFC and Option 1 for KRSC within ranges identified in the Initial Statement of Reasons (ISOR), which allow for take and possession of Chinook Salmon up to the daily bag and possession limits. The Department's recommendation will be presented for potential adoption during the California Fish and Game Commission meeting on May 6, 2026.

For clarity purposes, the Department proposes to add language back into subsection 7.40(b)(50)(E) 2.d.,and e. on the Klamath River and subsections 7.40(b)(50)(E) 6.b., e. and f. of the Trinity River that states salmon fishing will

remain open to the take of grilse after the adult quota for each area has been reached. This language was removed from the regulatory text when the KRFC fishery was closed in 2023. It is necessary to include this language in the regulatory text to eliminate confusion for anglers and law enforcement now that the KRFC fishery is anticipated to reopen in 2026 with an adult and grilse fishery. The proposed language does not change what is authorized and only clarifies existing regulatory requirements.

If you have any questions or need additional information, please contact Jay Rowan, Chief, Fisheries Branch at Fisheries@wildlife.ca.gov.

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

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State of California
Fish and Game Commission
Pre-Adoption Statement of Reasons for Regulatory Action

Amend Subsection (b)(50) of Section 7.40
Title 14, California Code of Regulations
Re: Klamath River Basin Sport Fishing 2026

I. Date of Initial Statement of Reasons: November 13, 2025

II. Date of Pre-Adoption Statement of Reasons: April 17, 2026

III. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: February 12, 2026 Location: Sacramento

(b) Discussion Hearing

Date: April 16, 2026 Location: Sacramento

(c) Adoption Hearing

Date: May 6, 2026 Location: Goleta

IV. Description of Modification of Originally Proposed Language of Initial Statement of Reasons (ISOR)

At the April 16, 2026, California Fish and Game Commission (Commission) meeting, the California Department of Fish and Wildlife (Department) recommended bag and possession limits, basin quota, and adult size regulations for Klamath River fall Chinook Salmon (KRFC) and Klamath River spring Chinook Salmon (KRSC) for consideration by the Commission for inclusion in the 2026 Klamath River Basin sport fishing regulations. The recommendations reflect as Option 1 for KRFC and Option 1 for KRSC within ranges identified in the Initial Statement of Reasons (ISOR), which allow for take and possession of Chinook Salmon up to the daily bag and possession limits. The Department's recommendation is slated for adoption at the Commission's May 6, 2026 meeting.

The Department recommends an overall Klamath River Basin quota of 3,248 adult KRFC. Comprising this quota, the Department recommended a KRFC daily bag limit of 2 fish, with no more than one adult over 23 inches total length and a possession limit of 6 fish, with no more than 3 fish over 23 inches total length. For subsection 7.40(b)(50)(E) 2.c., on the Klamath River main stem above the I-5 bridge, the Department recommended that the KRFC fishery remain closed for the 2026 season. The Department also recommended a KRSC daily bag limit of 1 fish and possession limit of 2 fish for any size KRSC.

For clarity purposes, the Department proposes to add language back into subsection 7.40(b)(50)(E) 2.d.,and e. on the Klamath River and subsections 7.40(b)(50)(E) 6.b., e. and f. of the Trinity River that states salmon fishing will remain open to the take of grilse after the adult quota for each area has been reached. This language was removed from the regulatory text when

the KRFC fishery was closed in 2023. It is necessary to include this language in the regulatory text to eliminate confusion for anglers and law enforcement now that the KRFC fishery is anticipated to reopen in 2026 with an adult and grilse fishery. The proposed language does not change what is authorized and only clarifies existing regulatory requirements. Additionally, information was added was added to the PFMC Overfishing Review section to explain that the fishery is no longer in overfished status.

V. Reasons for Modification of Originally Proposed Language of ISOR:

The Klamath River Basin allocation has been identified as a range between 0–67,600 adult KRFC. The Department bases annual daily bag and possession limit recommendations on annual quotas. In large quota years, daily bag and possession regulations are more liberal to allow for increased harvest opportunity. In low quota years, regulatory recommendations are more conservative to protect the stock and achieve basin spawner escapement goals. Although KRSC stocks are not managed or allocated by PFMC, KRSC overlap in ocean distribution with KRFC and share similar marine and freshwater habitat challenges.

VI. Summary of Primary Considerations Raised in Opposition and in Support

Comment:

February 17, 2026—Heidi Carpenter- Harris, Trinity County Board of Supervisors (written comment).

The commenter requests that the Commission provide a limited 2026 in-river recreational salmon opportunity for the Trinity River of a one-fish daily bag limit with other appropriate safeguards. Trinity County recognizes the Commission's responsibility to conserve salmon and share that commitment, but after three years of closure are seeking a balanced, science informed path forward that protects salmon as well as restores a carefully managed recreational fishery that is economically and culturally important to the region. Monitoring counts for 2025 are encouraging compared to 2024. The multi-year closure of in-river recreational salmon opportunities has had measurable impacts on businesses and families in Trinity County. They are recommending a daily bag limit of one adult salmon beginning July 1, 2026, quota-based management using the existing Klamath-Trinity subquota structure and in-season controls, and trigger based adaptive management which would include immediate closure if needed. They are requesting a limited opportunity to help sustain the region, while keeping conservation a priority.

Response:

In April 2026, the PFMC recommended a recreational fishery allocation of 3,248 adult KRFC to the Klamath River Basin (KRB) for the 2026 season. In response to the PFMC's recommendation, the Department has recommended to the Commission a KRB quota of 3,248 adult KRFC. For KRFC, the Department recommended a 2 fish daily bag limit, and 6 fish possession limit. Subquotas are in place for KRFC on the Klamath and Trinity rivers, and once the adult KRFC quota has been reached, then no KRFC over 23 inches may be kept. For KRSC, the Department recommended a one fish daily bag limit and 2 fish possession limit for any size KRSC.

Comment:

April 16, 2026 – James Stone, President of the Northern California Guides and Sportsmen's Association (NCGASA) (verbal comment).

Commenter supports the Department's recommendations.

Response:

Comments noted and appreciated.

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

The Klamath River Basin, which consists of the Klamath River and Trinity River systems, is managed for fall-run Chinook Salmon (*Oncorhynchus tshawytscha*) through a cooperative system of state, federal, and tribal management agencies. Salmonid regulations are designed to meet natural and hatchery escapement needs for salmonid stocks, while providing equitable harvest opportunities for ocean sport, ocean commercial, river sport, and tribal fisheries.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of sport and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The California Fish and Game Commission (Commission) adopts regulations for the ocean salmon sport (inside three miles) and the Klamath River Basin (in-river) sport fisheries which are consistent with federal fishery management goals.

Tribal entities within the Klamath River Basin maintain fishing rights for ceremonial, subsistence, and commercial fisheries that are managed consistent with federal fishery management goals. Tribal fishing regulations are promulgated by individual tribal governments.

Klamath River Fall-Run Chinook Salmon
Adult Klamath River fall-run Chinook Salmon (KRFC) harvest allocations and natural spawning escapement goals are established by PFMC. The KRFC harvest allocation between tribal and non-tribal fisheries is based on court decisions and allocation agreements between the various fishery representatives.

PFMC Overfishing Review
KRFC stocks have been designated as “overfished” by PFMC. This designation is the result of not meeting conservation objectives for these stocks. Management objectives and criteria for KRFC are defined in the PFMC Salmon Fishery Management Plan (FMP). The threshold for overfished status of KRFC is a three-year geometric mean less than or equal to 30,525 natural area adult spawners. This overfished-threshold was met for KRFC during the 2015-2017 period. The 30,525 KRFC natural area adult spawners is considered the minimum stock size threshold, per the FMP. The KRFC adult natural area spawning escapement for 2024 was 24,032 natural area adult spawners, which is below the one-year conservation threshold of 40,700 natural area adult spawners. The most recent three-year geometric mean of 27,879 is still less than the required 40,700 natural area adult spawners conservation threshold, therefore the KRFC are still considered as an “overfished” stock. **The KRFC adult spawning escapement for 2025 natural area spawning adults totaled 39,869, with the new three-year geometric mean of 34,166 resulting in moving the fishery out of "overfished" status into "rebuilding."**

Accordingly, the FMP outlines a process for preparing a “rebuilding plan” that includes assessment of the factors that led to the decline of the stock, including fishing, environmental factors, model errors, etc. The rebuilding plan includes recommendations to address conservation of KRFC, with the goal of achieving rebuilt status. Rebuilt status requires meeting a three-year geometric mean of 40,700 adult natural area KRFC spawner escapement. The plan developed by representatives of NMFS, PFMC,

U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife (Department), and tribal entities, was submitted to PFMC in February 2019, adopted by PFMC in June 2019, and submitted to NMFS in August 2019. Forthcoming recommendations from the rebuilding plan may alter how KRFC are managed in the future, including changing the in-river allocation number, and/or allocating less than the normal target number.

Klamath River Spring Chinook Salmon

The Klamath River Basin also supports Klamath River spring Chinook Salmon (KRSC). Naturally produced KRSC are both temporally and spatially separated from KRFC in most cases. Presently, KRSC stocks are not managed or allocated by PFMC. This in-river sport fishery is managed by general basin seasons, daily bag limit, and possession limit regulations. KRSC harvest is monitored on the Klamath River below the Highway 96 bridge at Weitchpec to the mouth of the Klamath River by creel survey. The upper Trinity River, upstream of Junction City, is monitored using tag returns from anglers.

KRFC Allocation Management

The PFMC allocation for the Klamath River Basin sport harvest is normally a minimum of 15 percent of the non-tribal PFMC harvest allocation of KRFC. Preseason stock projections of 2026 adult KRFC abundance will not be available from PFMC until March 2026. The 2026 basin allocation is recommended by PFMC in April 2026. That allocation will inform the quota that the Department proposes to the Commission for adoption as a quota for the in-river sport harvest at the Commission's May 2026 teleconference meeting.

The Commission may adopt a KRFC in-river sport harvest quota that is different than the quota proposed by the Department or the PFMC 2026 allocation for that fishery. Commission modifications need to meet biological and fishery allocation goals specified in law or established in the FMP.

The annual KRFC in-river sport harvest quota is specified in subsection 7.40(b)(50)(D)1. The quota is split among four geographic areas with a subquota for each area, expressed as a percentage of the total in-river quota, specified in subsection 7.40(b)(50)(D)2. For angler convenience, the subquotas, expressed as the number of fish, are listed for the affected river segments in subsection 7.40(b)(50)(E).

The in-river sport subquota percentages are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the in-river sport quota;

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the in-river sport quota;

The spit area (within 100 yards of the channel through the sand spit formed at the Klamath River mouth) closes to all fishing after 15 percent of the total Klamath River Basin quota has been taken downstream of the Highway 101 bridge.

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the in-river sport quota; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the in-river sport fishery quota.

These geographic areas are based upon the historical distribution of angler effort to ensure equitable

harvest of adult KRFC in the Klamath River and Trinity River. The subquota system requires the Department to monitor or assess angler harvest of adult KRFC in each geographic area. All areas are monitored on a real time basis, except for the Klamath River upstream of Weitchpec and in the Trinity River. Due to funding and personnel reductions, the Department does not currently conduct real time harvest monitoring in the Klamath River upstream of the Weitchpec and in the Trinity River.

The Department has developed Harvest Predictor Models (HPM), which incorporate historic creel survey data from the Klamath River downstream of Iron Gate Dam to the confluence with the Pacific Ocean, and the Trinity River downstream of Lewiston Dam to the confluence with the Klamath River. Each HPM is driven by the positive relationship between KRFC harvested in the respective lower and upper subquota areas of the Klamath River and the Trinity River. The HPMs will be used by the Department to implement fishing closures to ensure that anglers do not exceed established subquota targets. Using this method, the upper Klamath River subquota area generally closes between 28-30 days after the lower Klamath River subquota is reached. Similarly, the upper Trinity River subquota area generally closes 45 days after the lower Klamath River subquota has been met. The Department also takes into consideration several other factors when implementing closure dates for subquota areas, including angler effort, KRFC run timing, weir counts, and ongoing recreational creel surveys performed by the Hoopa Valley Tribe in the lower Trinity River below Willow Creek.

Sport Fishery Management
The KRFC in-river sport harvest quota is divided into geographic areas, and harvest is monitored under real time subquota management. The KRSC in-river sport harvest is managed by general season, daily bag limit, and possession limit regulations.

The Department presently differentiates the two stocks by the following sport fish season in each sub-area:

Klamath River

July 1 through August 14 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth.

August 15 to December 31 – KRFC quota management.

Trinity River

July 1 through August 31 – General Season KRSC.

For purposes of clarity, daily bag and possession limits apply to that section of the Trinity River downstream of the Old Lewiston Bridge to the confluence with the South Fork Trinity River.

September 1 through December 31 – KRFC quota management.

The daily bag and possession limits apply to both stocks within the same sub-area and time period. Current regulations in subsections 7.40(b)(50)(E)2.a. through 2.e. specify bag limits for KRFC stocks in the Klamath River. Current regulations in subsections 7.40(b)(50)(E)6.b., e., and f. specify bag limits for KRFC stocks in the Trinity River. Current regulations in subsection 7.40(b)(50)(C)2.a. and 2.b. specify KRSC and KRFC possession limits, respectively.

Proposed Changes

KRFC Adult Stocks (Sport Fishery Quota Management)

Quota: For public notice requirements, the Department recommends the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows PFMC and Commission to make adjustments during the 2026 regulatory cycle.

Subquotas: The proposed subquotas for KRFC stocks are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the total quota equates to [0-11,492];

2. Main stem Klamath River downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the total quota equates to [0-33,800];

3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the total quota equates to [0-11,154]; and

4. Main stem Trinity River downstream of the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the total quota equates to [0-11,154].

Seasons:

- Klamath River - August 15 through December 31
- Trinity River - September 1 through December 31

Bag and Possession Limits

Because the PFMC recommendations are not known at this time, ranges are shown in [brackets] below of bag, possession, **and size** limits which encompass historical quotas. All are proposed for the 2025 KRFC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-4] Chinook Salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until the subquota is met, then 0 fish over [20-24] inches total length.
- Possession limit - [0-12] Chinook Salmon of which no more than [0-4] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.

The final KRFC bag, possession**, and size** limits will align with the final federal regulations to meet biological and fishery allocation goals specified in law or established in the FMP.

As in previous years, no retention of adult KRFC is proposed once the subquota has been met.

Size Limits

KRFC are managed based on adult quotas which is the maximum number of adult fish (age three and older) that can be harvested. In 2023, the Department moved away from the fixed standing cutoff size between grilse and adult Chinook Salmon of 23 inches total length to using a range between 20 to 24 inches total length as an annual option for cutoff size. This allows for annual variation in size cutoffs, as informed by previous year(s) data to manage the harvest of the adult KRFC quota more effectively. The Department is currently conducting a post season assessment of KRFC length and age data which will be used to help determine the proposed 2026 size cutoff. The 2026 proposed adult cutoff will be presented at the April Commission meeting.

Option 2: KRFC Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to and support any federal action. This option prohibits all methods of targeting KRFC including catch and release fishing.

KRSC Sport Fishery

The KRSC recreational sport fishery has been closed multiple times in the recent past through the emergency rulemaking process. The current stock status and the need to compensate for large-scale changes in fishery effort have necessitated the Department to consider regulations of this fishery annually. As a result, the management of KRSC has been incorporated into the annual Klamath sport fish rulemaking process.

Seasons:

- Klamath River – July 1 through August 14
- Trinity River – July 1 through August 31

Option 1 Bag and Possession Limits

Ranges are shown in [brackets] below of bag and possession limits which encompass historical ranges. All are proposed for the 2025 KRSC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-1] Chinook Salmon
- Possession limit - [0-2] Chinook Salmon.

Option 2: KRSC Fishery Closure

This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRSC should the Department be concerned with stock status or predicts a large shift in effort due to widespread salmon closures in other areas of the state. In any year, should the PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to potential effort shift. This option prohibits all methods of targeting KRSC including catch and release fishing.

Other Changes for Clarity

Language referencing the size of an adult fish is removed from subsection (50)(E)2.e. in the second column as the size is already included in the following column as a range in the options provided. This change is necessary for consistency and clarity. Also, in subsections (50)(C)2., (50)(D)2.b., and (50)(E)2.e the words “to the mouth” have been added to clarify the lower boundary of this stretch of the Klamath River to be the mouth of the river as it meets the ocean.

Benefit of the Regulations

The benefits of the proposed regulations are conformance with federal fishery management goals, sustainable management of Klamath River Basin fish resources, health and welfare of California residents, and promotion of businesses that rely on salmon sport fishing in the Klamath River Basin.

Consistency and Compatibility with Existing Regulations

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to promulgate sport fishing regulations (Fish and Game Code sections 200, 205, 315, and 316.5). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulations. Commission staff has searched the California Code of Regulations and has found no other state regulations related to sport fishing in the Klamath River Basin.

Update

The Department recommends a Klamath River Basin quota of 3,248 adult KRFC. At the April 16, 2026 Commission meeting, the Department recommended a KRFC daily bag limit of 2 fish, with no more than one adult over 23 inches total length and a possession limit of 6 fish, with no more than 3 fish over 23 inches total length (Option 1 for KRFC from the ISOR). For subsection 7.40(b)(50)(E) 2.c., on the Klamath River main stem above the I-5 bridge, the Department recommended that the KRFC fishery remain closed for the 2026 season. The Department also recommended a KRSC daily bag limit of 1 fish and possession limit of 2 fish for any size KRSC (Option 1 for KRSC from the ISOR). The Department's recommendation is slated for adoption at the Commission's May 6, 2026 meeting.

For clarity purposes, the Department proposes to add language back into subsection 7.40(b)(50)(E) 2.d.,and e. on the Klamath River and subsections 7.40(b)(50)(E) 6.b., e. and f. of the Trinity River that states salmon fishing will remain open to the take of grilse after the adult quota for each area has been reached. This language was removed from the regulatory text when the KRFC fishery was closed in 2023. It is necessary to add this language back into the regulatory text to eliminate confusion for anglers and law enforcement now that the KRFC fishery is anticipated to reopen in 2026 with an adult and grilse fishery. The proposed language does not change what is authorized, it only clarifies existing regulatory requirements. Additionally, information was added to the PFMC Overfishing Review section to explain that the fishery is no longer in overfished status.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Signed Original on File
Received March 16, 2026

MEMORANDUM

Date: March 9, 2026

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

From: Meghan Hertel, Director

Subject: **Addendum to the 2025 Initial Study and Negative Declaration for Proposed Amendments to Klamath River Basin Sport Fishing Regulations, Subsection (b)(50) of Section 7.40, Title 14, California Code of Regulations**

In compliance with the California Environmental Quality Act, the Department of Fish and Wildlife (Department) has prepared the enclosed Addendum to the 2025 *Initial Study and Negative Declaration for Proposed Amendments to the 2026 Klamath River Basin Sport Fishing Regulations, Title 14, California Code of Regulations (CCR)*.

The California Fish and Game Commission (Commission) proposes to amend the Klamath River Basin sport fishing regulations as set forth in subsection 7.40(b)(50), Title 14, CCR for Klamath River fall-run Chinook Salmon and Klamath River spring Chinook Salmon based on federal fisheries management goals and to make additional changes for clarity. Based on the addendum to the 2025 initial study, the Department assesses that the proposed amendments to the Klamath River Basin sport fishing regulations will not have a significant effect or potentially significant effect on the environment. The Department recommends the Commission adopt the Negative Declaration.

If you have any questions regarding the enclosed documents, please contact Karen Mitchell, Senior Environmental Scientist, at inlandfisheriesreg@wildlife.ca.gov.

ec:

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State Of California
Natural Resources Agency

Addendum to the 2025 Negative Declaration Regarding Klamath River Basin Sport Fishing

Title 14, California Code of Regulations
Section 7.40
2026 Fishing Season

Prepared by:

California Department of Fish and Wildlife

On behalf of:

California Fish and Game Commision
As Lead Agency Under The California Environmental Quality Act

(OAL Notice File No. 2026-x)

Introduction

The California Department of Fish and Wildlife (CDFW) has prepared this addendum pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., to inform consideration by the California Fish and Game Commission (Commission) of proposed amendments to existing regulations governing Klamath River Basin sport fishing. Annually, CDFW recommends Klamath River Basin (KRB) sport fishing regulations to the Commission. The Commission then makes the final determination on what amendments to the regulations should be implemented and is the lead agency for the purposes of CEQA. Under Fish and Game Code Section 200, the Commission has the authority to regulate the taking or possession of fish for the purpose of sport fishing.

The Commission proposes to amend Klamath River Basin sport fishing regulations as set forth in Title 14, subsection 7.40(b)(50), California Code of Regulations for Klamath River fall Chinook Salmon (KRFC) (*Oncorhynchus tshawytscha*; KRFC) and Klamath River spring Chinook Salmon (*Oncorhynchus tshawytscha*; KRSC). Each year, CDFW evaluates the potential need to amend the existing salmon regulations in the KRB to align with federal fisheries management goals. Any proposed changes to salmon fishing regulations are presented to the Commission for consideration.

The Commission adopted regulations closing the KRFC and KRSC sport fisheries on the Klamath and Trinity rivers in 2025 with the certification of a Final Negative Declaration under CEQA (2025 Klamath River Basin Sport Fishing Regulations Negative Declaration (ND))(SCH No. 2025040692). The 2025 Klamath River Basin Sport Fishing Regulations ND provides relevant and important informational value as the Commission, as the CEQA lead agency, considers proposed amendments to the existing regulations for the 2026 KRB sport fishing season in California. This addendum documents the Commission’s consideration of related environmental effects.

Earlier Project Approval

CEQA review of the proposed project was conducted in accordance with the Commission’s certified regulatory program approved by the Secretary for the California Natural Resources Agency pursuant to Public Resources Code Section 21080.5 (See generally CCR, Title 14, Sections 781.5 and 15251(b)). CEQA requires all public agencies in the state to evaluate the environmental impacts of discretionary projects they propose to carry out or approve, including promulgating regulations, which may have a potential to significantly affect the environment.

In 2025, the Commission certified a Final ND Regarding Klamath River Basin Sport Fishing Regulations (2025 Klamath River Basin Sport Fishing Regulations ND)(SCH No. 2025040692) as the lead agency under CEQA as part of the Commission’s review

and adoption of KRB sport fishing regulations which focused on the potential for significant environmental impacts from a potential decrease or increase of KRFC and KRSC daily bag and possession limits for the Klamath and Trinity rivers. For KRFC, the Commission considered a quota range of 0–67,600 adult KRFC in the KRB, a daily bag limit range of 0-4 KRFC, and a possession limit range of 0-12 KRFC. For KRSC, the Commission considered a daily bag limit range of 0-1 KRSC, and a possession limit range of 0-2 KRSC. The Commission also considered an option (i.e., Option 2) to close salmon fishing in the KRB to provide protection to KRFC and KRSC, should the Department be concerned with stock status. The Commission, as the CEQA lead agency, certified the 2025 ND and determined adoption of the regulations as proposed would not result in any new significant or substantially more severe environmental effects. The Commission adopted regulations closing the KRFC and KRSC in-river sport fisheries for the 2025 season.

Proposed 2026 chinook salmon bag and possession limits

KRFC Adult Stocks (Sport Fishery Quota Management)
As in prior years, the Department is proposing a range for the quota, daily bag and possession limits, and size limits for KRFC.

Quota: KRFC are managed based on adult quotas, which is the maximum number of adult fish (age three and older) that can be harvested. The Department recommends the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows the Commission to make adjustments during the 2025 regulatory cycle.

Subquotas: The proposed subquotas for KRFC stocks are shown in **Figure 1**, and are as follows:

1. Main stem Klamath River from the California-Oregon border to the Highway 96 bridge at Weitchpec -- 17 percent of the total quota equates to [0-11,492];
2. Main stem Klamath River from downstream of the Highway 96 bridge at Weitchpec to the mouth of the Pacific Ocean -- 50 percent of the total quota equates to [0-33,800];
3. Main stem Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the total quota equates to [0- 11,154]; and
4. Main stem Trinity River downstream from the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the total quota equates to [0-11,154].

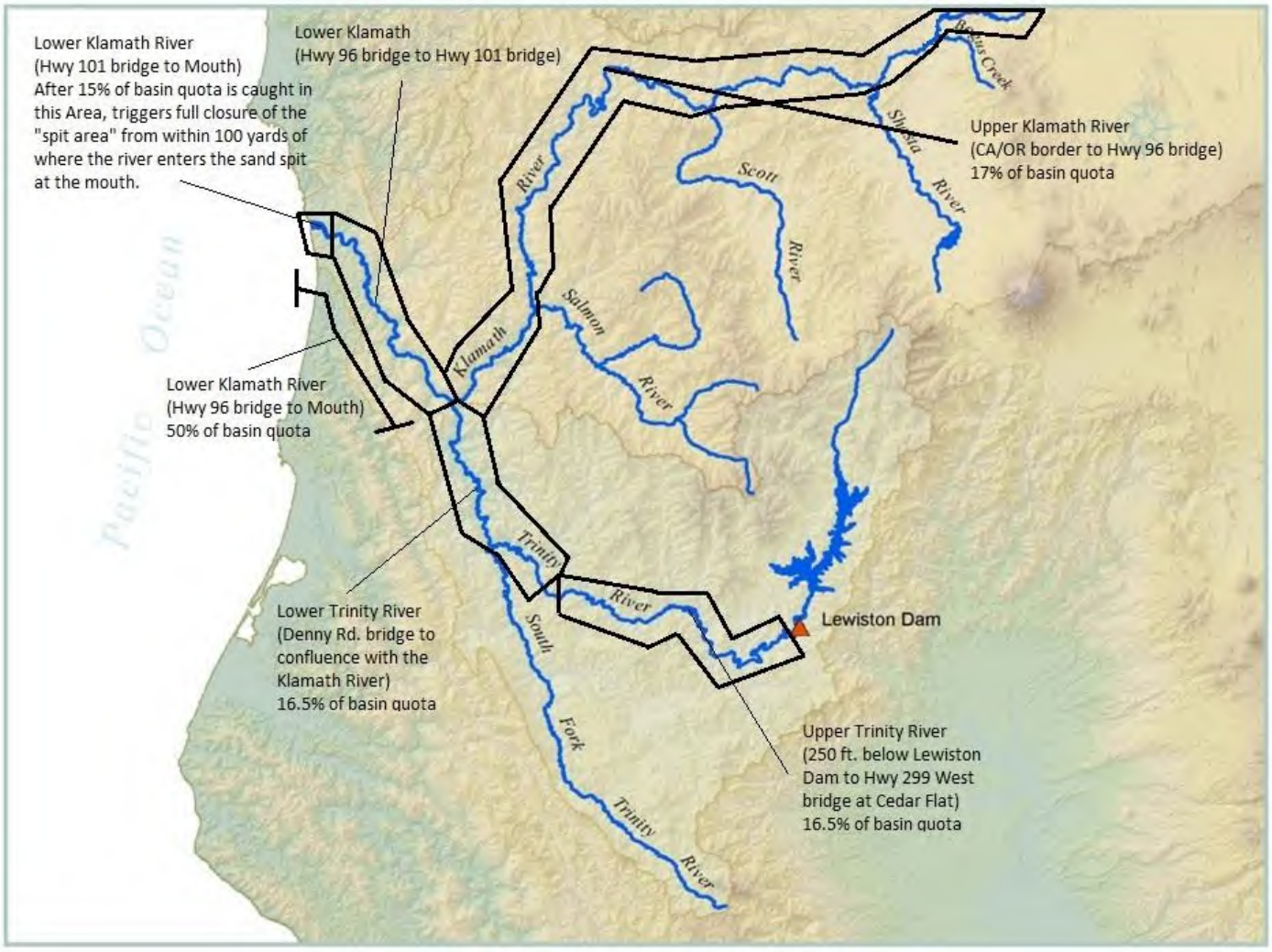


Figure 1. Map of the Klamath River Basin, showing the subquotas by reach of Trinity and Klamath rivers, and the associated subsections of 7.40(b)(50)(E).

No changes are proposed for the Klamath River and Trinity River KRFC seasons:

- Klamath River - August 15 to December 31
- Trinity River - September 1 to December 31

Size Limits

In 2023, the Department moved away from the fixed standing cutoff size between grilse (two-year old salmon) and adult Chinook Salmon of 23 inches total length to using a range between 20 to 24 inches total length as an annual option for cutoff size. This allows for annual variation in size cutoffs, as informed by previous year(s) data to manage the harvest of the adult KRFC quota more effectively. The Department is currently conducting a post-season assessment of KRFC length and age data which will

be used to help determine the proposed 2026 size cutoff. The 2026 proposed adult cutoff will be presented at the April Commission meeting.

Option 1: Bag and Possession Limits
Because the PFMC recommendations are not known at this time, ranges are shown in [brackets] below of bag and possession limits which encompass historical quotas. All are proposed for the 2026 KRFC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-4] Chinook Salmon – of which no more than [0-4] fish over [20-24] inches total length may be retained until the subquota is met, then 0 fish over [20-24] inches total length.
- Possession limit - [0-12] Chinook Salmon of which no more than [0–4] fish over [20-24] inches total length may be retained when the take of salmon over [20-24] inches total length is allowed.

As in previous years, no retention of adult KRFC is proposed once the subquota has been met.

Option 2: KRFC Fishery Closure
This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRFC should a reduction in the stock be indicated by PFMC abundance projections. In any year, should the PFMC recommend a complete or near complete closure of ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Department flexibility to respond to and support any federal action. This option prohibits all methods of targeting KRFC including catch and release fishing.

KRSC Sport Fishery
The KRSC sport fishery has been closed multiple times in the recent past through the emergency rulemaking process. The current stock status and the need to compensate for large-scale changes in fishery effort have necessitated the Commission to consider regulations for this fishery annually.

Seasons:

- Klamath River – July 1 through August 14
- Trinity River – July 1 through August 31

Option 1: Bag and Possession Limits
Ranges are shown in [brackets] below of bag and possession limits which encompass historical ranges. All are proposed for the 2025 KRSC fishery in the Klamath and Trinity rivers.

- Bag Limit - [0-1] Chinook Salmon

- Possession limit - [0-2] Chinook Salmon

Option 2: KRSC Fishery Closure
This option would close salmon fishing in the Klamath River Basin as specified by river reach(es) in subsection 7.40(b)(50) to provide protection to KRSC should the Department be concerned with stock status or predict a large shift in effort due to widespread salmon closures in other areas of the state. In any year, should PFMC recommend a complete or near complete closure of the ocean recreational salmon fishery and/or an allocation of 0 (zero) adult KRFC to the in-river fishery, this option would give the Commission flexibility to respond to potential effort shift. This option prohibits all methods of targeting KRSC including catch and release fishing.

The 2025 Klamath River Basin Sport Fishing Regulations ND found no significant impacts for the KRB quota range and range of proposed daily bag and possession limits for KRFC and KRSC sport fishing. The proposed 2026 KRB quota, and daily bag and possession limit ranges fall within the previously analyzed ranges for the KRB quota and proposed bag and possession limits for KRFC and KRSC stocks. Therefore, there are no new significant or substantially more severe impacts from amending the KRB sport fishing regulations to either reduce or increase the KRFC or KRSC daily bag and possession limits on the Klamath and Trinity rivers.

No Subsequent Environmental Document is Required

In general, CEQA applies whenever a public agency proposes to carry out or approve a discretionary project (Public Resources Code, Section 21080(a)). CEQA provides that, where a public agency proposes to modify a previously approved project for which a final negative declaration or environmental impact report (Environmental Document or ED) was adopted or certified:

> "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred" (CCR, Title 14, Section 15164(b)).

- A Subsequent ED (Section 15162) required when there is substantial evidence that:
  - Substantial changes are proposed in the project, which will require major revisions to the previous ED due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - Substantial changes occur with respect to the circumstances under which the project is being undertaken, which will require major revisions to the previousED due to the involvement of new significant environmental effects or

a substantial increase in the severity of previously identified significant effects; or

- New information, which was not known and could not have been known at the time the previous ED was adopted or certified as complete, becomes available.

An Addendum to the 2025 Klamath River Basin Sport Fishing Regulations ND (Section 15164) is proper because the changes or additions to the project presented in this Addendum are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent ED have occurred.

The Commission may properly prepare and may rely on an addendum in accordance with Section 15164 to fulfill its obligations under CEQA.

No Additional Impacts under CEQA

The Commission has determined that amending the current KRB sport fishing regulations based on salmon abundance estimates will not result in any new or significant or substantially more severe environmental impacts than previously analyzed and disclosed in the 2025 Klamath River Basin Sport Fishing Regulations ND for this project.

This project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. There are no impacts to the habitat of fish and wildlife species.

This approval action adjusts the previous year's daily bag and possession limits based on more current salmon abundance estimates. No other aspect of the project is changed. No new significant or substantially more severe impacts under CEQA will occur due to this change.

Amendment of the Klamath River Basin Sport Fishing Regulations

The Commission subjected the draft addendum to its own review and analysis. Based on that review and analysis, the draft reflects the independent judgment of the Commission and fulfills the Commission's responsibilities.

In conclusion, the Commission finds that amending the KRB sport fishing regulations in CCR, Title 14, Section 7.40, will not result in any new significant or substantially more

severe environmental effects than previously analyzed and disclosed in the 2025 Klamath River Basin Sport Fishing Regulations ND. The Commission also finds that subsequent or supplemental review beyond this Addendum is not warranted pursuant to the CCR, Title 14, Section 15164, in connection with this proposed action.

_____ _____

Melissa Miller-Henson, Executive Director Date

California Fish and Game Commission

Photo Credit: CDFW

KLAMATH RIVER BASIN SPORT FISHING REGULATIONS

PRESENTATION TO THE FISH AND GAME COMMISSION

April 15-16, 2026

Jonathan Nelson

Anadromous Fisheries Program Manager

Fisheries Branch

Presentation Overview

- Management of Klamath River Fall Chinook (KRFC) and Spring Chinook (KRSC) Salmon runs in the Klamath River Basin
- Proposed 2026 Regulatory Recommendation for KRSC in the Klamath River Basin
- Map of Klamath River Basin Sub-quota Areas
- Proposed 2026 Regulatory Recommendation for KRFC in the Klamath River Basin
- Timeline

KRFC and KRSC Management

Klamath River Fall Chinook (KRFC)

- The Pacific Fishery Management Council (PFMC) establishes annual harvest allocations and natural spawning escapement goals for adult KRFC
- KRFC recreational river sport fishery quota allocation typically conforms to PFMC recommendations (minimum of 15% of non-tribal allocation)
- CDFW makes annual recommendations for KRFC season, bag, and possession limits based on status of stock and/or quota

Klamath River Spring Chinook (KRSC)

- As of 2025, CDFW makes ***annual recommendations*** for the KRSC season, bag, and possession limits based on stock status, environmental conditions, and fisheries management outcomes for the KRFC fishery
- PFMC does not make recommendations for this fishery

2026 KRSC Recommendations

Klamath River Spring Chinook (KRSC)

Seasons:

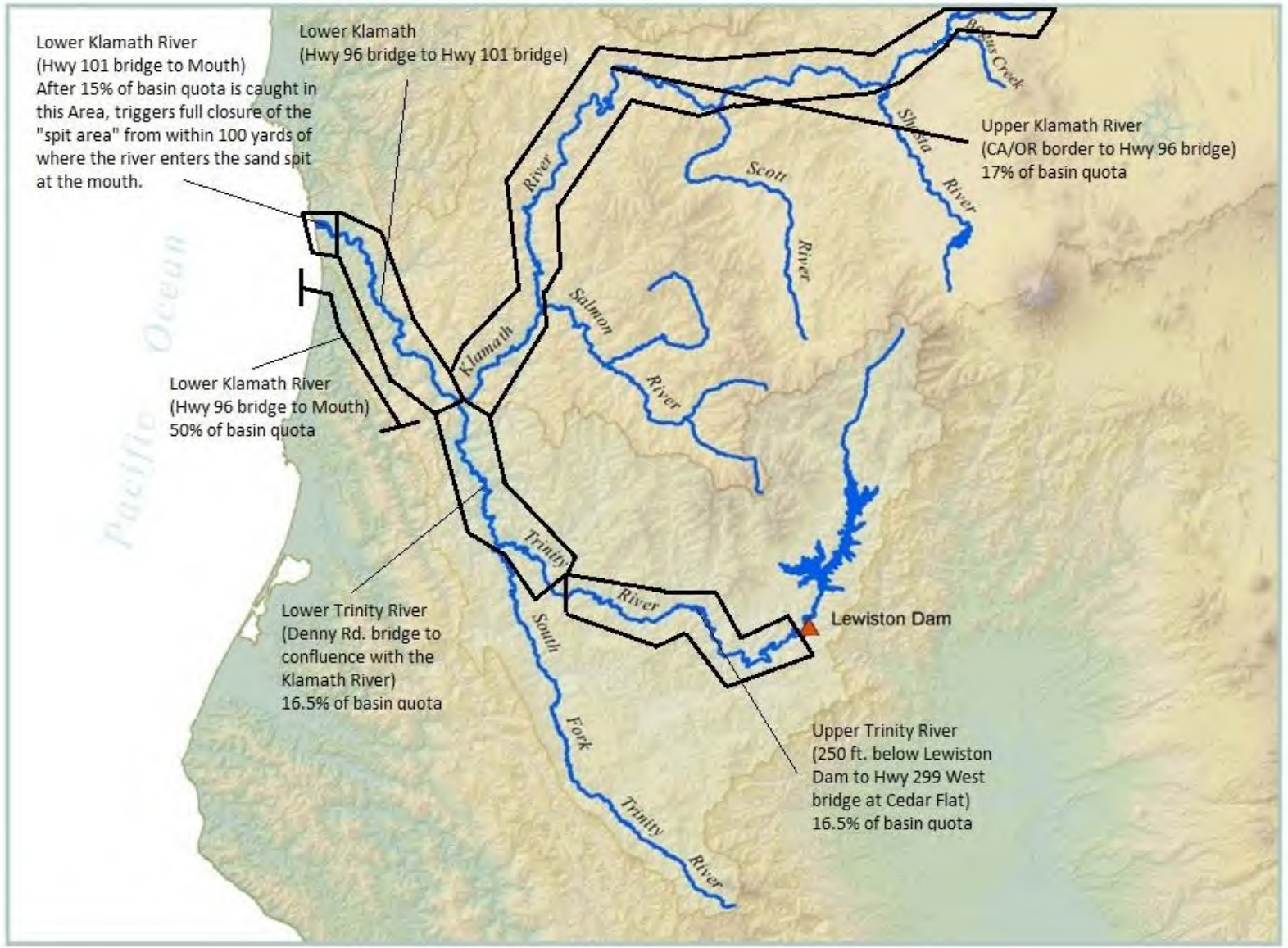
- July 1- August 14 - Klamath River [Section 7.40(b)(50)(E)2.e]
- July 1- August 31 - Trinity River [Sections 7.40(b)(50)(E)6.b,c,e]

Daily Bag and Possession Limit:

- 1 daily bag; 2 possession limit for any size Chinook Salmon

NOTE: CDFW will be collecting tissues samples during Angler Surveys in Klamath River section to determine the genetics of harvested fish and evaluate potential impacts to KRSC stock.

Klamath River Basin Sub-Quota Areas



2026 KRFC Recommendation

Klamath River Fall Chinook (KRFC)

KRFC River Sport Fish Harvest Quota: **3,248** adult fish

Seasons:

- August 15 – December 31 - Klamath River (Closed above I-5 Bridge)
- September 1 – December 31 - Trinity River

Adult/Grilse Size Cutoff Range: ≥ 23 inches total length (TL)

Daily Bag Limit: 2 Chinook salmon

- no more than 1 fish ≥ 23 inches TL may be retained

Possession Limit: 6 Chinook salmon

- no more than 3 fish ≥ 23 inches TL may be retained

NOTE: Once the sub-quota is met for each area (except for the Spit) then only fish under 23 inches TL may be retained for the seasons with same bag and possession limits

Timeline – 2026

- *February 12th – Notice hearing*
- April 16th – Discussion Hearing
  - Post PFMC recommendation
- May 6th – Adoption Hearing
- New regulations go into effect
  - July 1, 2026 – KRSC
  - August 15, 2026 – KRFC

Photo credit: CDFW

Questions | Contact

Photo credit: CDFW

Jonathan Nelson

Anadromous Fisheries Program Manager

Fisheries Branch

Fisheries@wildlife.ca.gov

Outlook

Public Comment Submission May 5-6 Fish and Game Commission Meeting

From Trent Tuthill <ttuthill@trinitycounty.org>
Date Fri 04/17/2026 09:32 AM
To FGC <FGC@fgc.ca.gov>

Attached letter submitted for May 5-6 Fish and Game Commission meeting.

Thanks
Trent

Trent Tuthill
Trinity County Administrative Officer
(530) 623-1382
ttuthill@trinitycounty.org

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THE MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL E-MAIL MESSAGE TO US. THANK YOU.

TRINITY COUNTY

Board of Supervisors

P.O. BOX 1613, WEAVERVILLE, CALIFORNIA 96093-1613

PHONE (530) 623-1217 FAX (530) 623-8365

February 17, 2026

California Fish and Game Commission
Erika Zavaleta
Melissa Miller-Henson, Executive Director
715 P Street
PO Bos 944209
Sacramento, CA 95814

Subject: Request for 2026 Trinity In-River Recreational Salmon Fishing Opportunity with a One-Fish Limit

President Zavaleta and Executive Director Miller-Henson,

On behalf of Trinity County, we respectfully request that the California Fish and Game Commission (Commission) provide for a limited 2026 in-river recreational salmon opportunity in the Trinity River, structured around a conservative one-fish daily bag limit (and other appropriate safeguards), rather than continuing the complete closure approach that has been in place for recent seasons.

Trinity County recognizes the Commission's responsibility to balance endangered species act requirements and conserve salmon stocks and we share that commitment. At the same time, after three years of closure, our community is seeking a balanced, science-informed path forward that protects Klamath River fall-run Chinook salmon (KRFC) while restoring a modest, carefully managed recreational fishery that is economically and culturally important to the Trinity region.

We are requesting that the Commission now consider a highly constrained 2026 in-river framework that allows limited recreational retention, using the Commission's existing quota/subquota tools and conservative bag limits.

Multiple 2025 in-season monitoring updates reported substantially stronger Chinook passage counts in key Klamath tributaries (e.g., Shasta and Scott rivers) compared with 2024—an encouraging sign that basin productivity may be improving, even if final basin wide run reconstruction is still pending. Please also consider the very small number of fish harvested by the recreational, in-river fishing community (typically in the 1-2% range, excluding tribal harvest, ref *CDFW Klamath River Basin Fall Chinook Salmon Spawner Escapement, In-river Harvest and Run-size Estimates, 1978-2022*).

The multi-year closure of in-river recreational salmon opportunity has had real and measurable consequences for Trinity County businesses and families—particularly guides, outfitters, lodging, fuel, groceries, restaurants, and other visitor-serving services.

RIC LEUTWYLER DISTRICT 1 | JILL COX DISTRICT 2 | LIAM GOGAN DISTRICT 3 | HEIDI CARPENTER- HARRIS DISTRICT 4 | JULIA BROWNFIELD DISTRICT 5

Trinity County requests the Commission direct CDFW to develop and bring forward 2026 Trinity in-river recreational regulations that restore limited opportunity while keeping conservation as the priority. We recommend:

- Daily bag limit: one (1) adult Chinook salmon, beginning July 1st, 2026.
- Quota-based management using the existing Klamath-Trinity subquota structure and in-season controls/closures. CDFW's 2025 materials describe the basin subquota approach and monitoring framework used to ensure harvest targets are not exceeded.
- Trigger-based adaptive management, including immediate closure if in-season indicators show risk to escapement objectives, and alignment with PFMC conservation constraints.

We are not requesting a return to "business as usual." We are requesting a limited, highly regulated fishery that (a) protects KRFC conservation needs and (b) provides a modest opportunity that helps sustain the region's economy and community identity.

Sincerely,

H Carpenter-Harris

Heidi Carpenter-Harris, Chairman
Trinity County Board of Supervisors

Tracking Number: (2023-18MPA)

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: Greg Helms
Address:
Telephone number:
Email address: ghelms@oceanconservancy.org

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) - Summarize the proposed changes to regulations: This Petition requests 7 MPA network refinements representing consensus recommendations of the Santa Barbara Channel MPA Collaborative. The refinements address MLPA governance and management pillars aimed at enhanced compliance/enforceability, regulatory clarity, and MPA design guidelines.

4. Rationale (Required) - Describe the problem and the reason for the proposed change: The 7 MPA refinements are proposed to improve and refine MPAs and/or MPA management in Santa Barbara and Ventura Counties based on Santa Barbara Channel MPA Collaborative Members' on-the-ground/water experience as well as the findings of the MLPA Decadal Management Review. MPA outcomes are closely linked with their core management pillars including research and monitoring; education and outreach; policy and permitting; and enforcement and compliance. The 7 proposed refinements in this petition are described in the attached narrative, and appear under Santa Barbara/Ventura in the spreadsheet submitted by the Collaborative Network and linked here. Column D of the spreadsheet summarizes the concern/problem addressed and column G provides the justification for the proposed refinement.

SECTION II: Optional Information

5. Date of Petition: November xx, 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:

10. Supporting documentation: Identify and attach to the petition any information supporting the proposal including data, reports and other documents: See attached narrative and rationale.

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: These adjustments likely pose minimal economic impact and would fall well within the range evaluated in the original CEQA document.

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: 11/28/2023

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

Petition for MPA refinements
Submitted by Greg Helms
Co-chair, Santa Barbara Channel MPA Collaborative

Background and Overall Rationale: The Santa Barbara Channel MPA Collaborative (SBC Collaborative) is composed of members from organizations and agencies aiding management and community engagement with MPAs in Santa Barbara and Ventura, CA. SBC Collaborative actively engages in MPA outreach and monitoring, gathering community input, and conducting projects to increase MPA awareness and compliance, visitation, and protection. SBC Collaborative engaged closely with the Decadal Management Review, considered members' on-the-ground experiences of local MPAs, convened to discuss each MPA in the Santa Barbara Channel Region in the context of the Decadal Review, and offers the following 7 MPA refinements recommended by consensus (consensus refers to all present during the in-person meeting of the SBC Collaborative on July 11, 2023) for consideration by the California Fish & Game Commission (FGC). Each is intended to enhance MPA success in attaining the goals of the Marine Life Protection Act (MLPA); discussion of each recommendation draws from guidance provided by the FGC Marine Resource Committee at the 2023 DMR convening and the follow-up MRC meeting on July 20, 2023.

Consensus recommendations:

1. Vandenberg SMR: Create a narrow alongshore SMCA allowing shore fishing for finfish by hook and line only.

Guiding rationale: Maintain contribution to MLPA goals 1-4, 6 while addressing equity concerns caused by consumptive activity allowed nearby within Vandenberg SMR.

Discussion: Vandenberg SMR is a core State Marine Reserve serving to anchor the MLPA Central Coast Study Region size, spacing and habitat representation goals; the SMR includes coastline along Vandenberg Space Force Base and at Surf Beach, the key coastal access point along an otherwise remote coastal area for residents in and around Lompoc, CA. Recreation at Surf Beach is constrained by seasonal snowy plover conservation regulations. An equity concern has arisen due to the SMR restrictions not being applied to Vandenberg Space Force personnel and dependents, in contrast to non-military residents at nearby Surf Beach who must comply. Petitioner believes this inequity can best be resolved by equally enforcing no-take regulations throughout this SMR, but that such enforcement may be infeasible. Therefore, it is recommended that hook and line only fishing from shore be allowed within a newly established SMCA, to consist of a 100-meter zone inshore of the existing SMR allowing hook and line fishing for finfish only along the coastal dimension of the existing MPA shape. The new SMR/SMCA regulations would apply and be enforced equitably across military and civilian populations.

2. Point Conception SMR: Provide continued support for Marine Monitor (M2) radar, ground-truthing, and agency coordination

Guiding rationale: Governance - To improve compliance and/or enforceability; MLPA Goal 5

Discussion: Point Conception anchors the northern reaches of the South Coast Study Region MPA network, protecting remote coastal and offshore habitats. Its remoteness, as well as extensive coastal

private land, pose access challenges for traditional enforcement by CDFW wardens. To address this, radar surveillance systems have been successfully employed to aid monitoring of the SMR. Collaborative members report M2 radar systems are providing crucial use data for the MPA but note high vessel activity that is a potential cause for concern. SBC collaborative recommends continued support for the M2 radar system to continue monitoring vessel activity within the SMR, and for ground-truthing and agency coordination to distinguish recreational (surf) visitation from potential MPA violations. California's MPA network includes several remote MPAs for which traditional enforcement patrols may not be adequate to ensure compliance; the Point Conception SMR M2 radar system may serve as an important model for addressing these challenges.

3. Kashtayit SMCA: Refine regulatory language to: "Recreational take of finfish, invertebrates, and giant kelp is allowed."

Guiding Rationale: Governance - Simplifies regulatory language and enhances public understanding.

Discussion: Kashtayit SMCA is a small SMCA aimed at cultural resource protection and education. Kashtayit SMCA is located along the highly visited Gaviota State Beach. Members of the SBC Collaborative (including enforcement partners) report visitors, along with those working to improve compliance, have difficulty interpreting the existing regulatory language for the SMCA due to its length and parenthetical exceptions. The recommended refinement would include and protect most species intended for protection with much greater clarity and public understanding. An additional recommendation is that State officials help collaborate locally for repairs to the Gaviota Pier to aid public access and safety in and around Kashtayit SMCA.

4. Campus Point No-Take SMCA: Use red, rather than purple, to identify this MPA on maps

Guiding rationale: Governance – enhances public understanding.

Discussion: On- and offshore hook and line fishing continue to be observed by SBC Collaborative participants, suggesting greater compliance with no-take regulations can be achieved. Our recommendation here is to depict this no-take SMCA in red, consistent with the other no-take MPAs and likely a clearer indication that the MPA is effectively a State Marine Reserve to the public.

5. San Miguel Island Special Closure: Consider removal of pre-existing special closure

Guiding rationale: Simplifies regulatory language; MPA design guidelines

The San Miguel Island Special Closure was originally designed to reduce disturbance to pinniped rookeries between Castle Rock and Judith point and was retained at the time of MLPA South Coast MPA design. The closure entails a seasonal exemption for sea urchin fishing and includes lengthy language pertaining to two separate regulations. With a NMFS marine mammal station equipped with M2 radar onsite and large, stable pinniped populations present in this zone, we encourage the State to consider whether the Special Closure remains a necessary sub-component of MPA design offshore western San Miguel Island.

6. Anacapa Island Special Closure – Revise to allow vessel access/landing at Frenchy's cove

Guiding rationale: Governance – accounts for Regional Stakeholder Group (RSG) intent while addressing non-consumptive access concern.

Discussion: In establishing an SMR/SMCA complex at Anacapa Island, the RSG retained two existing Special Closures designed to protect seabirds and brown pelicans, respectively. Aligning the boundaries of new MPA complex with those of the two special closures has interfered with the intended allowance for vessels to land safely at Frenchy's Cove. It is recommended that this intent be more effectively secured by including an exemption in the Special Closure for traditional vessel access and landing.

7. Anacapa Island Special Closure: Reassess and consider removing the full-island special closure

Guiding rationale: Simplifies regulatory language; MPA design guidelines

Discussion: Anacapa Island, as discussed above, has a SMR/SMCA complex overlain over one full-island, depth-based seabird protection closure and another special closure designed to protect brown pelicans. The overlapping conservation zones are visually confusing and, in particular, the broader seabird closure is based on depth along a steep, cliffside seabed area that is difficult to comply with and enforce. Given the extensive MPA and closure complex established to protect marine life including seabirds, SBC Collaborative recommends reassessment of the full-island closure and consideration of its removal as appropriate.

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-18MPA

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.

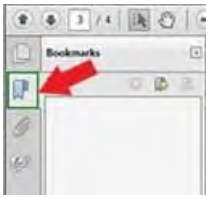
Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in 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

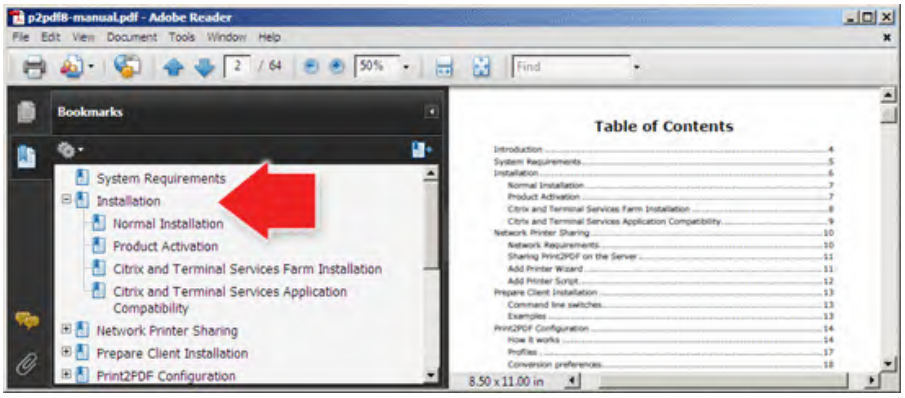
EASY GUIDE TO USING THE PACKET

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.



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: 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

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 22:56:46.81		Stan	Perry		[redacted]	San Diego	CA	[redacted]	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 21:49:57.96		Daniel	Guentert						US	Petition Signed
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 19:57:11.01		andrew	miller						US	Petition Signed
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2024-02-05 18:23:35.787		Marie	C Brown						US	Petition Signed
2024-02-05 18:22:27.89		John	Maud		[redacted]	Carlsbad	CA	[redacted]	US	Petition Signed
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2024-02-03 12:59:07.173		Victor	Flores						US	Petition Signed
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2024-02-03 12:35:33.723		Zachary	Matters						US	Petition Signed
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2024-02-03 11:57:45.247		Mike	Garske						US	Petition Signed
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2024-02-02 20:42:57.203		Alex	Selman						US	Petition Signed
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2024-02-02 20:21:30.41		Jeremy	Kerekes						US	Petition Signed
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2024-02-02 14:52:04.667		Jacob	Morris						US	Petition Signed
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2024-02-02 14:44:36.137		Mitchell	Ward						US	Petition Signed
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2024-02-02 14:09:39.14		JESSE	STOVALL		[redacted]	Fiddletown	CA	[redacted]	US	Petition Signed
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2024-02-02 14:03:34.583	Mr.	Hunter	Miller		[redacted]	Kuna	ID	[redacted]	US	Petition Signed
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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
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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
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2024-02-02 13:10:37.263		Steve	Dolan						US	Petition Signed
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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: BELL, DAVID C CIV USAF AFMC AFCEC/CZPW <[redacted]>
Sent: Thursday, August 28, 2025 9:02 AM
To: FGC <FGC@fgc.ca.gov>
Cc: YORK, DARRYL L CIV USSF SSC 30 CES/CEIE <[redacted]>
Subject: RE: Comments on proposed 2023-18MPA

California Fish and Game Commission

Per directions on how to submit comments on proposed Regulations, https://fgc.ca.gov/Regulations/Submit-Comments

We are pleased to provide the attached from the Department of Air Force in support of 2023-18MPA.

If possible , a return receipt is appreciated.

//SIGNED//

DAVID C. BELL, Ph.D., NH-04, DAF

AFCEC / CZPW - AF Regional Environmental Coordinator, Region 9 (AF REC 9)

Travis, AFB CA

[redacted]

DEPARTMENT OF THE AIR FORCE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
510 HICKAM AVENUE, BUILDING 250A
TRAVIS AFB, CA 94535

Aug 28, 2025

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

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

Subject: DEPARTMENT OF AIR FORCE SUPPORT TO 2023-18MPA Vandenberg SMCA

Dear Dr. Zavaleta, President
California Fish and Game Commission

Thank you for the opportunity to comment on the 2023 -18MPA submitted by the Ocean Conservancy. As the Department of 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 2023-18 MPA will create a narrow alongshore State Marine Conservation Area (SMCA) allowing shore fishing for finfish by hook and line only. This SMCA will address and rectify an inconsistent application of allowable shoreline fishing that will benefit the morale and welfare of the Vandenberg Space Force Base community and other visitors. Thus, the DAF supports 2023-18MPA.

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

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

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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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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.

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

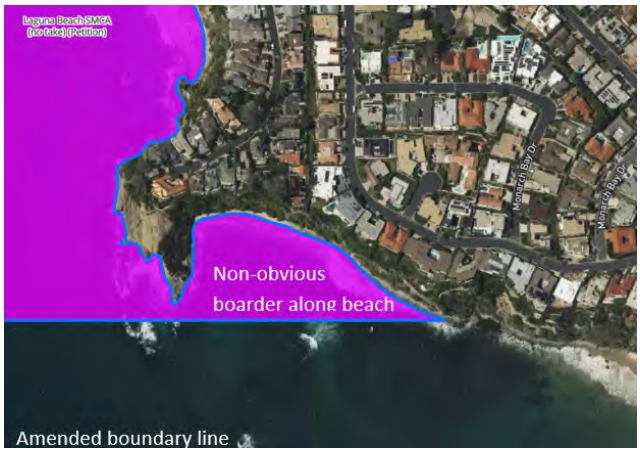
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced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

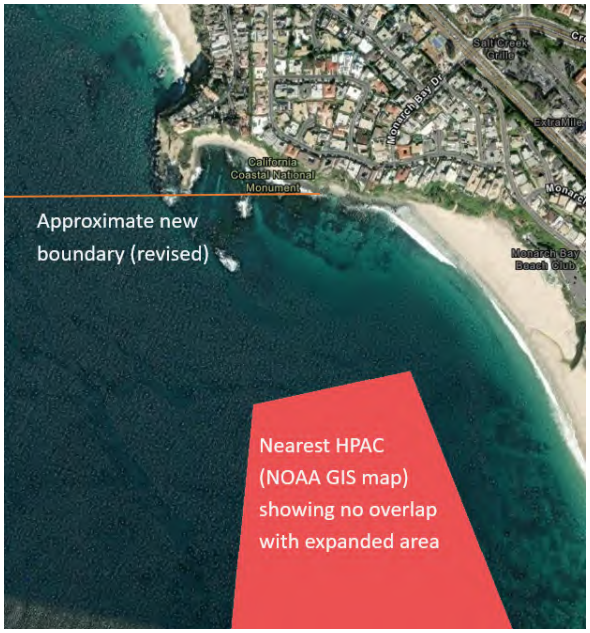
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational 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).

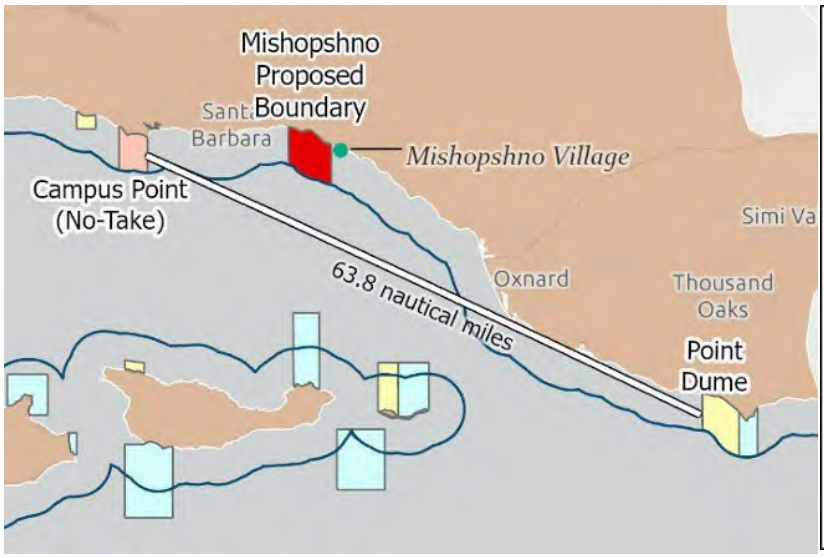


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

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).

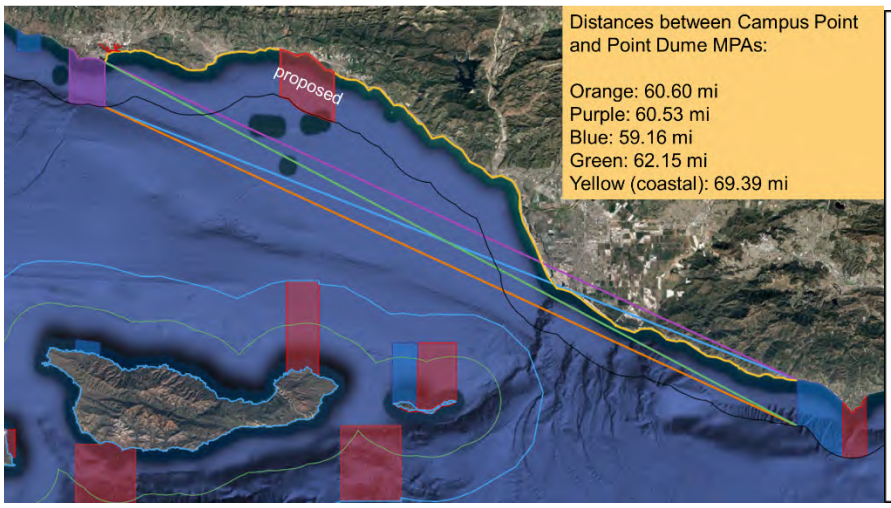


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

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.

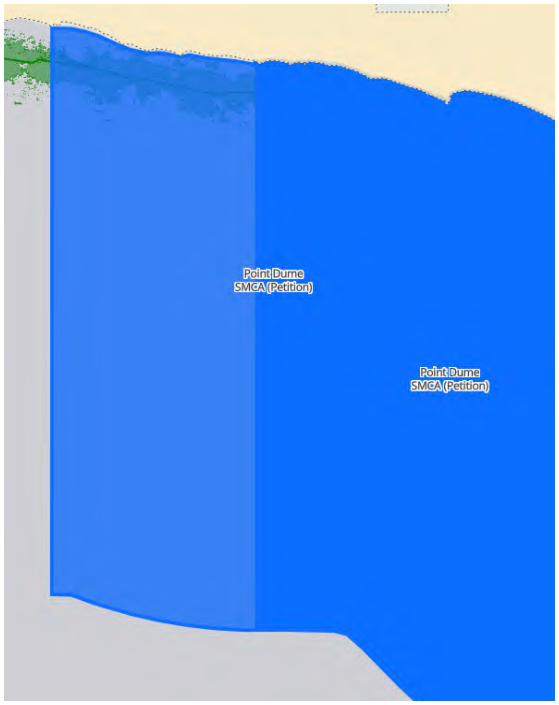
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing 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.

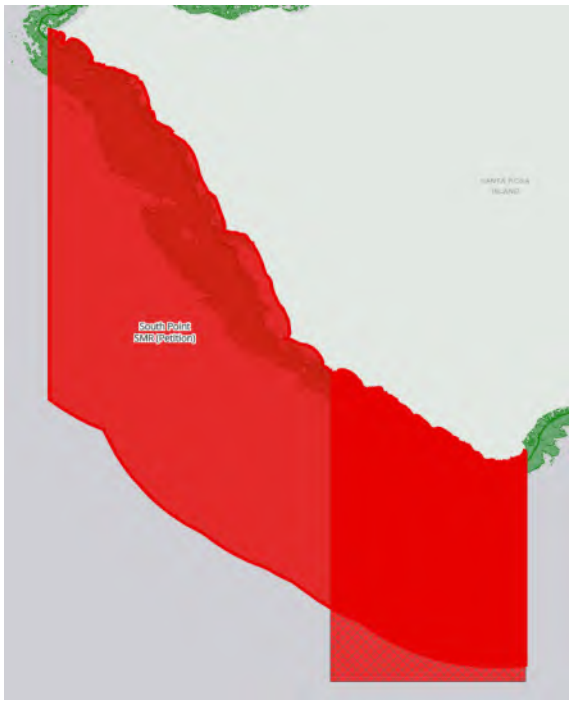
<u>Petition2023-33MPA – Reject</u>

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

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

Marine Conservation Institute
14301 Arnold Dr. Suite 25 • Glen Ellen, CA 95442 USA
www.marine-conservation.org

Outlook

April 2026 FGC Meeting Agenda Item 2: MPA Petitions Public Comment Letter

From Katie O'Donnell <katie@wildcoast.org>
Date Thu 04/02/2026 04:14 PM
To FGC <FGC@fgc.ca.gov>; fgcericsklar[redacted]; Samantha Murray [redacted] commissionerdariusanderson [redacted] commissioner.zavaleta [redacted]; jhostler [redacted]
Cc Shuman, Craig [redacted]; Waggoner, Claire [redacted]; Worden, Sara [redacted]; Eckerle, Jenn@CNRA <Jenn.Eckerle@resources.ca.gov>; Lewis, Staci@CNRA <Staci.Lewis@resources.ca.gov>; Esgro, Michael@CNRA <Michael.Esgro@resources.ca.gov>; Ashcraft, Susan [redacted] Miller-Henson, Melissa [redacted]

Good afternoon,

Please see the attached letter for **Agenda Item 2: MPA Petitions** for the upcoming April 15-16 FGC meeting.

Signed by 31 organizations and 2 individuals, the letter respectfully asks the FGC Commission to support CDFW's recommendation to reject petitions 2023-14, 2023-15, 2023-16, and 2023-18 (except for supporting 2023-18MPA_2: Marine Monitor radar at Point Conception).

This letter summarizes how these petitions would weaken the MPA network's integrity, fail to adhere to science-based guidelines and Marine Life Protection Act goals, and conflict with the Decadal Management Review. The letter notes that in total, the four petitions would reduce protections across 18 MPAs within California's MPA Network.

Thank you for your leadership and for considering these comments.

Please let me know if you have any questions!

Thank you,
Katie

--

WILDCOAST COSTASALVAJE

Katie O'Donnell
Senior Ocean Conservation Manager
she/her/hers

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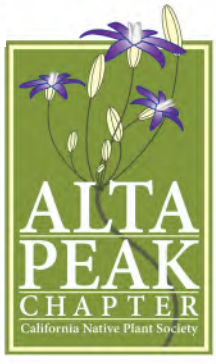

Friends of Rose Creek
"Connecting Our Communities"

April 2, 2026

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

Submitted electronically to fgc@fgc.ca.gov

RE: **Agenda Item 2** - Opposition to Petitions 2023-14, 2023-15, 2023-16, and 2023-18 which would weaken the California MPA Network

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

The undersigned organizations -representing public interest, marine science, environmental conservation, and coastal communities - strongly oppose Petitions 2023-14, 2023-15, 2023-16, and 2023-18 and agree with California's Department of Fish and Wildlife (CDFW)'s recommendations to deny them. These proposals would significantly weaken California's Marine Protected Area (MPA) Network and undermine the ecological integrity that the Marine Life Protection Act (MLPA) was created to protect. In total, the petitions would reduce protections across eighteen MPAs, including six State Marine Reserves (SMRs), two no-take State Marine Conservation Areas (SMCAs), eight SMCAs, and two Special Closure Areas.

We urge the Fish and Game Commission (FGC) to deny petitions that fail to meet the Decadal Management Review (DMR)'s definition of adaptive management: "Guided by the principles of adaptive management, [the first ten-year management review] is an opportunity to evaluate progress to date, celebrate accomplishments, provide lessons learned, and identify recommendations to strengthen the MPA Network and Management Program going forward."[1]

We oppose these petitions because they:

- **Weaken MPA Network Integrity**
  California's MPA network was intentionally designed using science-based guidelines developed by CDFW and expert scientists to ensure larval connectivity, habitat representation, trophic structure, and ecosystem resilience. Because the network functions as an interconnected system, weakening individual MPAs compromises the entire network and conflicts with the goals of the MLPA. The International Union for Conservation of Nature (IUCN) recognized the network's effectiveness by adding it to the Green List of Protected and Conserved Areas after a seven-year evaluation. Rolling back protections or increasing extractive activities threatens the network's ability to sustain biodiversity and ecological connectivity.

[1]California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022, nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209.

- **Fail to Adhere to Science-Based Guidelines and MLPA Goals**
  The MLPA requires that any modifications to MPAs support its six statutory goals and align with established scientific guidelines[2]. The petitions fail to meet these standards. The network's design was grounded in peer-reviewed research on fish movement, larval dispersal, and population persistence, including spatial population models demonstrating that minimum size and spacing criteria are essential for ecological connectivity. Reducing protections in ways that violate these criteria lacks scientific justification and risks degrading network performance.

  Scientific literature is also clear that adaptive management is intended to strengthen MPAs based on monitoring data, not weaken them[3]. As California enters a critical phase of long-term monitoring and adaptive management, peer-reviewed guidance emphasizes that adaptability means refining protections using new evidence, not making ad hoc reductions. A 2023 global synthesis of 307 MPA design recommendations across 56 publications established "permanence and adaptability" as foundational principles, defining the latter specifically as evidence-based enhancement rather than diminished protection[4].

- **Do Not Align with the Decadal Management Review (DMR)**
  The state has invested heavily in monitoring and data synthesis, including more than $60 million from the Ocean Protection Council since 2017. Findings from the DMR highlight the need to maintain and enhance resilience in the face of climate change, which is a goal fundamentally incompatible with weakening existing protections.

Deny Petition 2023-14MPA: Opening Sea Urchin Harvest to Commercial Fishing Within Existing MPAs

The undersigned organizations urge the FGC to reject Petition 2023-14MPA. The proposed changes fail to address the underlying drivers of kelp decline, contradicts the core mandates of the MLPA, and would weaken the integrity of the broader MPA network. We support CDFW's recommendation to deny the petition, including its conclusion that the proposal conflicts with the original objectives of the affected MPAs and does not align with adaptive management guidance from the DMR.

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[2]California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[3] Van Diggelen, Amanda D., et al. "California's Lessons Learned and Recommendations for Effective Marine Protected Area Network Management." *Marine Policy*, vol. 137, Mar. 2022, p. 104928, https://doi.org/10.1016/j.marpol.2021.104928. 7 January 2022.

[4] Burns, E. S., et al. "Finding harmony in Marine Protected Area design guidelines." *Conservation Science and Practice*. Vol. 5, Issue 6. https://doi.org/10.1111/csp2.12946. 24 April 2023.

The Proposed Action Would Not Address Kelp Loss

The petition seeks to open nine SMCAs to commercial urchin harvest to support kelp restoration. However, purple urchins - the species responsible for kelp barrens - represent only 0.26% of commercial landings and have almost no market value. Red urchins make up 99.73% of landings but are not driving kelp decline[5]. Opening MPAs would therefore incentivize removal of red urchins, not the ecologically harmful purple urchins, and would not meaningfully reduce urchin pressure on kelp forests. Current research instead supports targeted, science-based purple urchin removals using trained divers to minimize ecosystem impacts[6], [7].

The Petition Conflicts With MLPA Goals

The proposal undermines four MLPA goals (1, 2, 5, and 6) by exposing protected species to increased risk, weakening trophic dynamics, and creating enforcement challenges[8]. Allowing commercial take within MPAs increases confusion and accidental take, contradicting the MLPA's requirement for clear, enforceable protections[9]. Multiple gear types can be used to take urchins[10], and vessels can carry or switch gear, making it difficult for wardens to verify compliance within SMCAs[11]. Increasing allowable take in MPAs with already complex rules runs counter to MLPA Goal 5 and to the DMR's emphasis on improving,not weakening, management effectiveness.

In Southern California MPAs, intact trophic cascades have been shown to support kelp resilience during marine heatwaves[12],[13]. In these systems, predators such as lobsters and sheephead naturally regulate urchin populations [14],[15]. Opening these MPAs to commercial urchin harvest would erode these predator-prey relationships.

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[5] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[6] Bennet and Caton,2019. Marine heat wave and multiple stressors tip bull kelp forest to sea urchin barrens.https://www.nature.com/articles/s41598-019-51114-y
[7] Eisaguirre et al. 2020. Trophic redundancy and predator size class structure drive differences in kelp forest ecosystem dynamics.
[8] California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=
[9] Turnbull et. al. "Evaluating the social and ecological effectiveness of partially protected marine areas." *Conservation Biology*, Vol. 35, Issue 3. https://doi.org/10.1111/cobi.13677. 14 January 2021.
[10] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 25 Mar. 2026.
[11] 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.
[12] Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[13] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.
[14]Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[15] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.

On the North Coast, where sheephead and otters are absent, commercial harvest would still primarily remove red urchins rather than the purple urchins driving kelp loss[16],[17]. Scientific Collecting Permits offer a more appropriate tool for targeted purple urchin removal while maintaining network protections and supporting long-term commercial viability of red urchins.

The Petition Would Weaken the MPA Network

SeaSketch analysis shows the petition would reduce habitat connectivity and significantly downgrade the level of protection (LOP) in several MPAs. Point Dume, Swami's, and Point Vicente (currently functioning as a no-take SMR) would fall to "moderate-low" protection levels, undermining spacing and habitat representation guidelines essential to network design[18],[19],[20]. These changes would diminish long-term ecological benefits without evidence that commercial urchin harvest would improve kelp health.

Deny Petition 2023-15MPA: Opening Channel Island MPAs to Allow Take of Highly Migratory Species

The undersigned organizations urge the FGC to reject Petition 2023-15MPA because it conflicts with the goals of the Marine Reserves Working Group (MRWG) that supported the Channel Islands MPA designation process in 2003[21], as well as the goals of the MLPA. The petition also undermines ecosystem protections for highly migratory species (HMS), and creates enforcement challenges. We support CDFW's recommendation to deny the petition.

The proposal would open three no-take SMRs in the Channel Islands (Footprint, Gull Island, and Santa Barbara Island) to commercial fishing for pelagic and HMS species. These Channel Islands MPAs are among the largest, oldest, and most effective in the nation and serve as the "crown jewels" of California's MPA network. Reclassifying them as SMCAs contradicts the original planning goals for the region and the statewide MLPA framework.

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[16] Marine Mammal Commission. "Southern Sea Otter - Marine Mammal Commission." Marine Mammal Commission, Marine Mammal Commission, 2015, www.mmc.gov/priority-topics/species-of-concern/southern-sea-otter/. Accessed 25 Mar. 2026.
[17] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[18]SeaSketch California. 14_7 Point Dune SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/524. Accessed 27 Feb. 2026.
[19] SeaSketch California. 14_9 Swami's SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/526. Accessed 27 Feb. 2026.
[20] SeaSketch California. 14_8 Point Vicente SMCA (no-take) (Take/Designation) Discussion Forum. https://www.seasketch.org/california/app/forums/280/525. Accessed 27 Feb. 2026.
[21] History of the Community-Based Process on Marine Reserves at the Channel Islands National Marine Sanctuary 1999-2001. March 2002. https://nmschannelislands.blob.core.windows.net/channelislands-prod/media/docs/2001-marine-reserves-sac-history.pdf Accessed 25 Mar. 2026.

Inconsistent With MRWG and MLPA Goals

The Channel Islands MPAs were established to protect representative habitats, ecological processes, and ecosystem-level biodiversity, not individual species. The MRWG explicitly designed these reserves to safeguard whole ecosystems, a principle reinforced by past FGC decisions rejecting petitions focused on single species (e.g., the 2020–21 white shark MPA proposal)[22]. Opening MPAs to target HMS contradicts this ecosystem-based mandate.

The petition also conflicts with MLPA Goals 1 and 2, which require protecting marine life abundance and ecosystem integrity. Contrary to the petitioner's claims, HMS are not merely transient visitors, they are apex predators that provide critical top-down structural influence on the marine community. Although wide-ranging, they aggregate at predictable hotspots such as seamounts and fronts, and studies show increases in tuna size and reduced fishing pressure following MPA establishment[23],[24]. By foraging on resident MPA species, HMS gain access to high quality prey without the risk of capture from fishing. Allowing HMS take would remove these benefits and introduce new disturbances such as boat traffic, noise, pollution, and derelict gear that harm non-migratory species the MPAs were designed to protect.

Ecological Importance of Protecting HMS and Pelagics

HMS and pelagic species provide essential ecosystem services[25]. They transport nutrients across ocean regions and act as apex predators that regulate mid-trophic species[26],[27]. Removing them can trigger destabilizing food-web shifts, such as mesopredator booms. In Southern California, declines in sharks and billfish have been linked to increases in Humboldt squid, which then prey heavily on hake, herring, and crustaceans[28]. Allowing HMS fishing in MPAs risks amplifying these cascading effects. Generally, HMS fisheries also frequently catch non-target species, including threatened turtles and seabirds, although hook-and-line, spear, harpoon, and deep set buoy gear is highly selective and generally avoids surface-dwelling species. Introducing take into no-take MPAs would expose protected habitats and species to new risks, undermining the core purpose of the reserves.

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[22] California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022. Appendix G Supplemental Tables.
[23] McDonald, Gavin, et al. "Global Expansion of Marine Protected Areas and the Redistribution of Fishing Effort." *Proceedings of the National Academy of Sciences*, vol. 121, no. 29, 9 July 2024, https://doi.org/10.1073/pnas.2400592121.
[24] Curnick, David J, et al. "Interactions between a Large Marine Protected Area, Pelagic Tuna and Associated Fisheries." Vol. 7, 14 May 2020, https://doi.org/10.3389/fmars.2020.00318
[25] Heithas et al. 2008. Predicting ecological consequences of marine top predator declines.
[26]Bauer, S., and B. J. Hoye. "Migratory Animals Couple Biodiversity and Ecosystem Functioning Worldwide." *Science*, vol. 344, no. 6179, 4 Apr. 2014, https://doi.org/10.1126/science.1242552
[27] Reynolds, Heather L, and Keith Clay. "Migratory species and ecological processes." *Environmental Law*, vol. 41, no. 2, 2011, pp. 371–391. JSTOR, www.jstor.org/stable/43267495, https://doi.org/10.2307/43267495.
[28]Vetter, Russ, et al. Predatory interactions and niche overlap between mako shark, *isurus oxyrinchus*, and jumbo squid, *dosidicus gigas*, in the California Current. *CalCOFI Rep.*, Vol. 49, 2008, oceanrep.geomar.de/id/eprint/53785/1/4444.pdf.

Deny Petition 2023-16: Reclassify Stewart's Point and Bodega Head SMRs as SMCAs to Allow Commercial Salmon Trolling

The undersigned organizations urge the FGC to reject Petition 2023-16MPA because it conflicts with key goals of the MLPA, raises significant scientific concerns, and, according to CDFW, does not align with adaptive management guidance from the DMR. CDFW also notes that the petition contradicts the original purpose of the two SMRs, could create enforcement challenges, and may unintentionally increase pressure on groundfish species.

Conflicts With MLPA Goals

Petition 2023-16 is inconsistent with MLPA Goals 1, 2, and 6. It proposes reducing protections in two SMRs to allow commercial salmon trolling at a time when salmon populations are at historic lows[29], [30]. The commercial salmon fishery has been closed for three consecutive years (2023–2025) due to extremely low abundance driven by multi-year drought, warming waters, harmful algal blooms, and wildfire-related impacts on watersheds. Introducing new fishing pressure in SMRs would add stress to a species already in crisis, directly contradicting MLPA Goal 1, which requires protecting and maintaining species abundance.

The petition also conflicts with MLPA Goal 2, which prioritizes sustaining and rebuilding depleted, economically valuable species. Salmon clearly meet both criteria: they are economically important and severely depleted. Reclassifying SMRs as SMCAs to increase commercial harvest opportunities during a period of population collapse runs counter to the MLPA's conservation mandate. Finally, weakening protections in Stewart's Point and Bodega Head SMRs would undermine the integrity of the statewide MPA network, violating MLPA Goal 6. SMRs serve as the backbone of the network, and reducing their protection level diminishes the connectivity and ecological function the MLPA requires.

Scientific Concerns

While the petition correctly notes that climate change threatens salmon, its proposed action does nothing to address the root causes of salmon decline. Research shows that warming water temperatures and reduced streamflow have harmed salmon throughout their life cycle, contributing to long-term reductions in abundance[31]. Allowing take in SMRs would not mitigate these climate-driven stressors and would remove safeguards that currently allow salmon to recover and safely hunt for prey within those MPAs.

Recent scientific studies underscore the importance of maintaining strong protections. A 2023 study by Hamilton, Kennedy, and colleagues found that MPAs, despite facing climate stressors,

[29] PFMC. 2026. Review of 2025. Ocean Salmon Fisheries.
[30] CDFW. 2026. Chinook Salmon.
[31] Siegel, Jared E. and Crozier, Lisa G. "Impacts of Climate Change on Salmon of the Pacific Northwest: A review of the scientific literature published in 2019". 2020, https://doi.org/10.25923/jke5-c307

can function as climate refugia that buffer species from the worst impacts of warming[32]. Similarly, Smith et al. (2025) examined ecological communities in Central Coast MPAs before, during, and after the 2014–2016 marine heatwaves[33]. While MPAs did not prevent all climate-driven changes, some communities inside MPAs experienced less disruption than reference sites, and MPAs continued to support higher fish biomass, abundance, and diversity even during extreme heat events.

These findings suggest that maintaining the integrity of the existing MPA network is more likely to support the resilience of salmon and HMS under climate change than weakening SMRs to expand commercial fishing allowances. Strong, fully protected areas provide ecological stability that can help species, including salmon, better withstand climate-related pressures.

Deny Three Actions with Petition 2023-18: Modifications to allowed uses at several Santa Barbara Channel MPAs

The undersigned organizations urge the FGC to reject Petition 2023-18MPA because it is inconsistent with the goals of the MRWG and the MLPA and lacks scientific justification for removing protections for seabirds and pinnipeds. We support CDFW's recommendation to deny actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7, which would reduce protections for seabird and pinniped populations and weaken ecological protections. We also support CDFW's recommendation to support action 2023-18MPA_2 to continue support for the Marine Monitor (M2) radar at Point Conception SMR, because it aligns with the goals of the MLPA and the DMR recommendations regarding improving MPA enforcement.

Inconsistent With MRWG and MLPA Goals

Actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7 propose removing the Special Closures on San Miguel Island and Anacapa Island which were established prior to the creation of the MPA network to protect seabird and pinniped populations from human disturbance.[34] San Miguel Island is home to one of the largest pinniped rookeries and haul-out areas in the country and pinnipeds are highly sensitive to disturbance, especially during pupping and breeding, when disturbance can lead to reduced reproductive success or pup abandonment.[35] Similarly,

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[32] Hamilton, Susan L, et al. "Variable Exposure to Multiple Climate Stressors across the California Marine Protected Area Network and Policy Implications." *Ices Journal of Marine Science,* vol. 80, no. 7, 26 July 2023, pp. 1923–1935, https://doi.org/10.1093/icesjms/fsad120.
[33] Smith, Joshua G, et al. "Conservation Benefits of a Large Marine Protected Area Network That Spans Multiple Ecosystems." *Conservation Biology*, 9 Jan. 2025, https://doi.org/10.1111/cobi.14435
[34] National Park Service. "Marine Protected Areas - Channel Islands National Park". https://www.nps.gov/chis/learn/nature/marine-protected-areas.htm. Accessed 23 March 2026.
[35] Lowry, Mark S., Elizabeth M. Jaime, and Jeffrey E. Moore. 2021. Abundance and distribution of pinnipeds at the Channel Islands in southern California, central and northern California, and southern Oregon during summer 2016–2019. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-656. https://doi.org/10.25923/6qhf-0z55

Anacapa Island is home to the largest breeding colony of California brown pelicans in the world[36],[37].

Brown pelicans are extremely sensitive to noise and human disturbance, particularly during nesting when disturbance can cause nest abandonment[38]. Removing protections threatens these sensitive populations and conflicts with MRWG Goal 1 and MLPA Goals 1 and 2 which aim to protect populations of interest and the natural diversity and abundance of marine life.

Conclusion

We urge the FGC to reject Petitions 2023-14, 2023-15, 2023-16, and 2023-18 to ensure that California's marine ecosystems remain resilient, healthy, and protected for future generations.

Thank you for your leadership and for considering these comments.

Sincerely,

Organizations[39]

Tomas Valadez
California Policy Manager
Azul

Kayla Feairheller
CEO and Founder
Bleu World Corporation

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Barbara Brydolf
President Alta Peak Chapter
California Native Plant Society

Sharon Musa
External Affairs Manager
Catalina Island Conservancy

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[36] National Park Service. Restoring Anacapa Island: Seabird Habitat - Channel Islands National Park. https://www.nps.gov/chis/learn/nature/restoring-anacapa-island-sea-bird-habitat.htm. Accessed 24 March 2026.
[37] California Department of Fish and Wildlife. Anacapa Island Special Closure. Version 2, September 2022. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=104293.
[38] Anderson 1998. Dose-response relationships between human disturbance and brown pelican breeding success.
[39] Alphabetical by organization name

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Dan Silver
Executive Director
Endangered Habitats League

Laura Deehan
State Director
Environment California

Pamela Heatherington
Director
Environmental Center of San Diego

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Laura Hunter
Board Member
Escondido Neighbors United

Suzie Fortner
Executive Director
Friends of the Dunes

James Peugh
Chair
Friends of Famosa Slough

Michael Wellborn
Board President
Friends of Harbors, Beaches and Parks

Daniel Watman
Friends of International Friendship Park

Karin Zirk, Ph.D.
Executive Director
Friends of Rose Creek

Carissa Cabrera
Founder
Futuruswell

Val Schull
Water and Ocean Program Director
GreenLatinos

Kerry J. Nickols, Ph.D.
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Los Angeles Waterkeeper

Lance Morgan, PhD
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Adriana Guerrero-Nardone
Executive Director
Salted Roots

Muriel Spooner
Co-Chair Conservation Committee
San Diego Bird Alliance

Michael Blum
Principal
Sea of Clouds

Jack Eidt
Co-Founder
SoCal 350 Climate Action

Joanie Steinhaus
Ocean Program Director
Turtle Island Restoration Network

Katie O'Donnell
Senior Ocean Conservation Manager
WILDCOAST

Individuals[40]

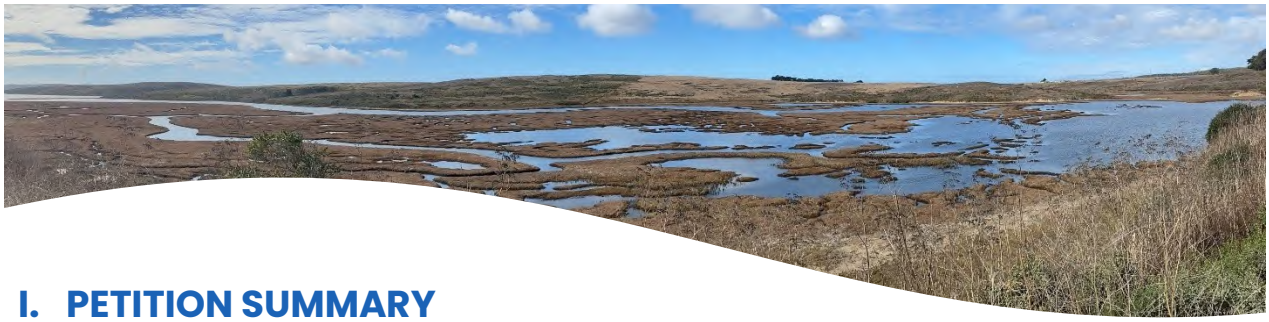
Natalie Borchardt, Senior Manager Natural Resources

MV Eitzel, Professional Researcher at University of California, Davis

[40] Individuals are signing onto this letter for themselves, and are not signing on behalf of their organization. In other words, their affiliation with an organization is not an endorsement by the organization, but only by the individual person.

California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition:

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)



I. PETITION SUMMARY

CFGC Tracking Number	2023-18MPA
Petition Contact/Affiliation	Greg Helms, Ocean Conservancy
Number of Proposed Actions	7
Affected MPAs	Vandenberg and Point Conception SMRs, Kashtayit and Campus Point SMCAs, and San Miguel Island and Anacapa Island Special Closures
Petition Summary	Multiple action items to modify allowed uses at several Santa Barbara Channel MPAs
Link to StoryMap page	2023-18MPA

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA MARINE PROTECTED AREAS

March 2026

II. CDFW RECOMMENDATIONS AND BRIEF JUSTIFICATION

Note: If a change to the Marine Protected Area (MPA) regulations is not needed to address the proposed change, California Department of Fish and Wildlife (CDFW) did not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-18MPA_1 Redesignate a portion of Vandenberg State Marine Reserve (SMR) to create a narrow State Marine Conservation Area (SMCA) alongshore for the entire length of Vandenberg SMR that allows recreational shore fishing for finfish by hook-and-line.	The petitioner's stated reason for the proposed change is that, "An equity concern has arisen due to the SMR restrictions not being applied to Vandenberg Space Force personnel and dependents, in contrast to non-military residents at nearby Surf Beach who must comply."	**Deny.** The proposed change is inconsistent with the original goals and intent of this MPA. Vandenberg SMR serves as a core component, or "backbone," of the state's ecologically connected MPA Network. Redesignating any portion of this SMR to an SCMA would result in the MPA no longer meeting Science Advisory Team (SAT) criteria for a habitat replicate of nearshore habitats. This would result in a gap in replication of nearshore habitats and would undermine the MPA's role in maintaining ecological connectivity within the MPA Network. Given the importance of Vandenberg SMRs' role in providing a nearshore habitat replicate, changes to this MPA would require compelling evidence of need. There was insufficient evidence to demonstrate a need that would justify compromising the connectivity of the MPA Network.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2022-04 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.	The petitioner's stated intent for the proposed change is to allow for families to once again fish for subsistence, and/or provide a low cost/no-cost recreational alternative for the residents of Lompoc and the surrounding area.	**Deny.** See 2023-18MPA_1.
2023-18MPA_2 Provide continued support for Marine Monitor (M2) radar, ground-truthing, and agency coordination at Point Conception SMR.	The petition states that there is high vessel activity in the remote Pt. Conception SMR, which is a challenge for enforcement, and that M2 radar monitoring system may help address enforcement challenges.	**Support, with alternative pathway.** Monitoring and enforcement are essential components of managing the MPA Network. CDFW values M2 monitoring and supports the collaborative use of resources to continue to support its use in the MPA Network. This proposed action would not require a change to the MPA regulations to implement and was not evaluated further.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-18MPA_3 At Kashtayit SMCA, simplify take regulations to: "Recreational take of finfish, invertebrates ~~(except rock scallops and mussels)~~, and giant kelp ~~by hand harvest~~ is allowed."	The petition states that, "[local stakeholders] (including enforcement partners) report visitors, along with those working to improve compliance, have difficulty interpreting the existing regulatory language for the SMCA due to its length and parenthetical exceptions."	**Deny.** The proposed change would change the intent of the regulations and reduce protections for giant kelp, rock scallops, and mussels, which were intentionally added in the Marine Life Protection Act (MLPA) Initiative planning process for Kashtayit SMCA. The proposed change does not advance adaptive management recommendations from the Decadal Management Review and does not address a current or emerging MPA management challenge, including an enforcement challenge.
2023-18MPA_4 Change color of No-take Campus Point SMCA from purple to red on maps	The petition states that depicting this No-take SMCA in red, consistent with SMRs, is likely a clearer indication that the MPA is a No-take area.	**Support, with alternative pathway.** Outreach and education are essential components of MPA management. This proposed action was in Bin 1, and the California Fish and Game Commission (CFGC) supported it with an alternative pathway. Please see the memo regarding the status of implementation. This proposed action would not require a change to the MPA regulations to implement and was not evaluated further.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-18MPA_5 Eliminate pinniped special closure at San Miguel Island	The petition states that strong and stable pinniped populations negate the continued need for the Special Closure.	**Deny.** The proposal to abolish the San Miguel Island and Anacapa Island Special Closures and to reduce the size of the California brown pelican fledgling area within the Anacapa Island Special Closure does not address a current MPA management challenge and would conflict with the original intent of these protections. These areas were established prior to MPA implementation in the northern Channel Islands to safeguard highly sensitive seabird and pinniped populations. Given ongoing sensitivity of these animals to human disturbance and natural population fluctuations, there is a continued need for these special closures.
2023-18MPA_6 Reduce the size of the brown pelican Anacapa Island Special Closure regulations to allow boat access to Frenchy's Cove	The petition states that boundaries of the brown pelican fledgling area of Anacapa Island Special Closure interfere with the intended allowance for boat landing at Frenchy's Cove.	**Deny.** See 2023-18MPA_5.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-18MPA_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"	The petition states that the overlapping conservation zones are visually confusing and the broader full island seabird closure is based on depth along a steep, cliffside seabed area that is difficult to comply with and enforce.	**Deny.** See 2023-18MPA_5.

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

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

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor? If yes, a. Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area? b. Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management).	No, this petition was not submitted by a tribe or representative designated by a tribe and does not have a tribal co-sponsor.

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

IV. PETITION EVALUATION

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-18MPA_1 VANDENBERG SMR PARTIAL RECLASSIFICATION TO AN SMCA

The petitioner requests that an alongshore strip of the Vandenberg State Marine Reserve (SMR) on the central coast be redesignated to a State Marine Conservation (SMCA) to allow shore-based hook-and-line fishing for finfish. The request is framed as a partial reclassification intended to address concerns related to, "the SMR restrictions not being applied to Vandenberg Space Force Base (SFB) personnel and dependents, in contrast to non-military residents at nearby Surf Beach who must comply." The Vandenberg SMR is adjacent to Vandenberg SFB, and much of the shoreline abutting the SMR lies within or immediately adjacent to base property. The petitioner states that, "the concern could be addressed through equally enforcing no-take regulations throughout this SMR, but that such enforcement may be infeasible." The petitioner proposes that establishing a 100-meter zone inshore of the existing SMR that allows hook-and-line fishing for finfish along the coastal dimension of the existing MPA would allow regulations to be enforced more equitably across military and civilian populations.

In addition to this petition, CFGC received a similar petition in 2022 (2022-04) from the City of Lompoc, which neighbors Vandenberg SFB and SMR. That petition was deferred pending completion of the Decadal Management Review (DMR). Petition 2022-04 requests that a half-mile onshore portion of the Vandenberg SMR at Surf Beach be redesignated to an SMCA to allow recreational shore fishing, including allowing take of "Sand Perch and/or similar species and take of Sand Crabs" for bait. The petition from the City of Lompoc states that, "[Implementation of Vandenberg SMR] has placed a great hardship upon the City, in terms of family subsistence, as well as creating a negative financial impact on the City of Lompoc due to a reduction in tourism related revenues." The City further states that Surf Beach previously provided a low- or no-cost recreational activity.

Due to the similar nature of these two proposed changes to Vandenberg SMR, CDFW evaluated petition 2022-04 (proposed Surf Beach SMCA) alongside the 2023-18MPA (proposed onshore strip SMCA).

CDFW finds the proposals in both petitions:

- Are inconsistent with the goals of the Vandenberg SMR, as defined during the MLPA Initiative planning process,
- Do not align with the original intent of the MPA,
- Do not address a current or emerging MPA management challenge, and
- Would not advance management of the MPA Network.

Both proposed changes, the shoreline ribbon SMCA and the Surf Beach SMCA, are inconsistent with the goals Vandenberg SMR was designed to meet during the MLPA Initiative planning process. These goals, which remain relevant today, include to:

> "*Provide for complete protection of a diverse area containing shallow hard and soft habitats, kelp beds, and associated fish and invertebrate, while benefiting from protection provided by an existing state marine reserve and restrictions on vessel traffic, including fishing vessels, due to the presence of Vandenberg Air Force Base. This area is important to the formation of an ecologically sound MPA Network component, by linking these habitats to similar habitats in other parts of the region."*

Vandenberg SMR was designed to replicate sandy beach, rocky intertidal, and shallow hard and soft bottom habitats within an SMR (Goal 4) and enhance the reproductive capacity of nearshore and midwater fish and invertebrate species (Goal 2); the lee of Point Arguello is likely larval retention area (Ohashi and Wang 2004, White et al. 2019).

Vandenberg SMR, like other SMRs, serves as a core component, or "backbone," of the state's ecologically connected MPA Network. Redesignating any portion of this SMR to an SCMA would result in the MPA no longer meeting Science Advisory Team (SAT) criteria for a backbone MPA (i.e., a habitat replicate). SAT guidelines require that MPAs that contribute to habitat replication be at least 9 square miles in area and have at least a Moderate-high level of protection (LOP). Allowing shore-based hook-and-line fishing would reduce the LOP of that area to Moderate-low. While the remaining portion of Vandenberg SMR would maintain an LOP of Very High, it would no longer contribute to replication goals of key nearshore habitats. Therefore, this proposed change would create a gap between hard and soft bottom (0-30 m) nearshore habitat replicate MPAs, as without replication at Vandenberg SMR, the spacing between replicate MPAs would exceed 62 mile SAT guidelines. As a result, both proposed options would result in the nearshore portion of the MPA losing status as a habitat replicate, which has the potential to compromise ecological connectivity objectives for the MPA Network and the overall Network design (see response to Question 9 for additional information).

The petitions would also increase regulatory complexity in an area that already presents enforcement challenges, thereby increasing the likelihood of non-compliance with both state and federal regulations. In addition to there being no public access along the portion of beach within the military base, there are two species in the area facing threats from habitat loss and human disturbance. Southern California steelhead (*Oncorhynchus mykiss*) is listed as Endangered (NMFS 1997), and western snowy plover (*Anarhynchus*

nivosus[2]) is listed as Threatened (USFWS 1993) under the federal Endangered Species Act (ESA). Southern California steelhead was also listed as Endangered in 2024 under the California Endangered Species Act (CESA). Vandenberg SMR protects the mouth of the Santa Ynez River, a historically significant spawning and nursery area for Southern California steelhead that once supported the largest steelhead run in southern California (Busby et al. 1996). MPAs near river mouths provide important benefits for steelhead where they aggregate prior to upstream spawning (Simenstad & Cordell 2000). Reducing protections alongshore could adversely affect returning steelhead and ongoing steelhead restoration efforts. In addition, seasonal closures are in place on the beach and dunes to protect snowy plovers, including a seven-month closure from March through the end of September that restricts public access to the north and south of Surf Beach. This area is also highly frequented by white shark (*Carcharodon carcharias*), which are fully protected in California waters. As such, granting either proposal would likely require additional regulatory language to restrict gear types and shore-based shark fishing to limit white shark fishery interactions. Thus, the proposed changes to partially redesignate Vandenberg SMR are anticipated to present enforcement feasibility challenges due to increasing regulatory complexity and the introduction of potential conflicts with steelhead and snowy plover restoration and recovery efforts.

Petition 2022-04 would present further enforcement challenges because the western snowy plover closure boundaries are temporary and can move from year to year; there are large, dynamic dunes that limit the visibility of any landmarks, and the dunes are not conducive to installation of permanent signage. Consequently, there are no prominent, permanent landmarks or geological features to utilize for boundaries for a SMCA at Surf Beach. The lack of visual boundaries for shore-based fishers would limit public understanding and increase enforcement challenges. The requested take allowance of, "Sand Perch and/or similar species and take of sand crabs" to use for bait would increase regulatory complexity and enforcement burden. For example, allowing take of sand crabs would allow digging that could disguise take of other invertebrates such as Pismo clams, making it difficult to gauge compliance at a distance.

Given all of these considerations, redesignation of any portion of Vandenberg SMR as an SMCA to allow shore fishing would require compelling evidence of need. Petition 2023-18MPA states the need for the proposed change is because the SMR restrictions are only being enforced for non-military personnel and are not being applied to Vandenberg Space Force personnel and dependents. CDFW's Marine Enforcement District (MED) currently enforces the regulations at Vandenberg SMR regardless of an individual's

[2] This is the updated scientific name for western snowy plover; however, the U.S. Fish and Wildlife Service has continued to use the scientific name *Charadrius nivosus nivosus* for the listed entity until publication of a rule revising the name on the list of endangered and threatened species.

affiliation with the Space Force, and communicates this to enforcement partners. Although the petitioner asserts a shoreline ribbon would, "improve equitable access" for non-military personnel to fish, the change would not result in equitable fishing access because most of the proposed shoreline ribbon lies within Vandenberg SFB and would still be inaccessible to the public. The change in Petition 2023-18MPA would provide increased access to shore fishing for finfish for both military personnel and the public specifically at Surf Beach (a stretch of approximately 0.5 miles), which would be open year-round to fish. Outside of snowy plover nesting season, the public would be able to access slightly more of the beach area near the base (e.g., Ocean Beach) in addition to Surf Beach, but would still be limited in beach access because of the base boundaries to the north and south. Redesignating only the Surf Beach portion of the SMR as an SMCA (as requested in Petition 2022-04) would provide the public and base personnel equal access to shore fishing. Surf Beach is adjacent to the base and is approximately nine miles from the City of Lompoc and has lower barriers to access than other nearby beaches; it has free parking, does not require base access, and is not subject to seasonal snowy plover closures.

CDFW carefully considered the statements in the City of Lompoc's petitions, including that, "the City of Lompoc is a regionally isolated community and is also recognized as a disadvantaged community," and that opening Surf Beach, "would allow for families to once again fish for subsistence." Considering Vandenberg SMR, the closest accessible areas to Vandenberg SFB and the City of Lompoc where fishing is allowed are Rancho Guadalupe Dunes Preserve to the north and Jalama Beach County Park to the south, which are accessible by car but are 35 and 20 miles away respectively (Patsch and Reineman 2023). Although there are recreational opportunities within Vandenberg SMR, fishing is prohibited. Given the limited information in the petition, the data readily available to CDFW, and the evaluation timeline, CDFW was unable to determine whether Vandenberg SMR is affecting access to subsistence fishing for a historically marginalized or underserved community (see response to Question 14 in Attachment 1). One of the Justice, Equity, Diversity, and Inclusion recommendations of the DMR is to, "Evaluate the accessibility of MPAs to various community groups." This evaluation could include an assessment of the communities near the City of Lompoc, identify potential regional equity and access issues in the MPA Network, and identify potential solutions. This evaluation was not feasible within the constraints of the petition evaluation process and implementing a site-specific redesignation without this assessment would be premature.

In summary, changes to California's MPA Network are subject to a deliberately high threshold, reflecting the Network's science-based design, its long-term conservation objectives, and the need to maintain ecological connectivity and consistency across regions., This threshold is particularly high for SMRs due to the their critical role as a

backbones of the MPA network through their contribution to habitat replication and connectivity and for protecting sensitive species and habitats. As documented above, any redesignation of this SMR would require compelling justification and evidence that the proposed change would advance the goals of the MPA Network while avoiding adverse ecological, enforcement, and equity outcomes. CDFW's evaluation did not find compelling justification and evidence to warrant recommending granting either petition's proposal.

RECOMMENDATION FOR 2023-18MPA_1

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

- Petition action **2023-18MPA_1**, Redesignate a portion of Vandenberg SMR to create a narrow SMCA alongshore for the entire length of Vandenberg SMR that allows recreational shore fishing for finfish by hook-and-line, and
- Petition **2022-04**, Redesignate a portion of Vandenberg SMR at Surf Beach to an SMCA that allows recreational shore fishing.

EVALUATION NARRATIVE FOR 2023-18MPA_2 PROVIDE CONTINUED SUPPORT FOR MARINE MONITOR (M2) RADAR, GROUND-TRUTHING, AND AGENCY COORDINATION AT POINT CONCEPTION SMR

The petition states that there is high vessel activity in the remote Pt. Conception SMR, which is a challenge for enforcement, and that M2 radar monitoring system may help address enforcement challenges. Monitoring and enforcement are essential components of managing the MPA Network. CDFW supports non-regulatory measures to address illegal fishing, including enhanced surveillance tools like M2 radar, to reduce unintentional noncompliance, and ensuring sufficient resources for enforcement. However, implementing this proposed action would not require a change to the MPA regulations.

RECOMMENDATION FOR 2023-18MPA_2

Given these considerations, the proposed change was not evaluated further and, **CDFW recommends CFGC support the petition action 2023-18MPA_2 with an alternative pathway**.

EVALUATION NARRATIVE FOR 2023-18MPA_3 KASHTAYIT TAKE CHANGE

The petitioner has requested to change the take regulations for Kashtayit State Marine Conservation Area (SMCA) to: "Recreational take of finfish, invertebrates ~~(except rock scallops and mussels)~~, and giant kelp (*Macrocystis pyrifera*) ~~by hand harvest~~ is allowed."

The petitioner seeks this change to enhance clarity and understanding of the regulations because, "[local stakeholders] (including enforcement partners) report visitors, along with those working to improve compliance, have difficulty interpreting the existing regulatory language for the SMCA due to its length and parenthetical exceptions."

CDFW finds the proposed change:

- Is inconsistent with the goals of the Kashtayit SMCA, as defined during the MLPA Initiative planning process,
- Does not align with the original intent of the MPA,
- Does not address a current or emerging MPA management challenge, and
- Would not advance management of the MPA Network.

The proposed change would simplify the regulations, but it would also change the intent of the regulations and eliminate provisions that are in place to protect giant kelp, rock scallops and mussels, and habitat in this MPA. Minimizing take of these species to protect their local abundance and their role in the ecosystem was an intentional choice at the time the MPA was designed. The Kashtayit SMCA was intended to allow low-impact recreational take, especially take in line with traditional Chumash practices (MLPA 2009a).

During the MLPA Design Process, the Blue Ribbon Task Force (BRTF) intentionally excluded take of rock scallops and mussels from the list of allowed invertebrates and limited take of giant kelp to recreational harvest by hand. This alternative was supported by the South Coast Regional Stakeholder Group and subsequently adopted by CFGC. The exclusion of rock scallops and mussels was an intentional decision to protect the local abundance of these species as well as their ecosystem service as habitat-forming species. Mussels and giant kelp create physical structure which provides habitat for other species (Cameron et al. 2024, Teagle et al. 2017). People harvesting rock scallops and mussels can also use tools that damage the substrate during harvest, which can result in permanent habitat loss (CDFG 2001, MLPA 2010). For these reasons, the BRTF recommended the alternative excluding rock scallops and mussels from the allowed take at Kashtayit SMCA.

The BRTF also considered options for commercial and recreational take, and the methods for take of giant kelp (hand harvest and mechanical harvest) when developing

recommendations for the regulations throughout the MPA Network. The decision to only allow recreational take of giant kelp by hand harvest in Kashtayit SMCA was intentional. Hand harvest of giant kelp removes smaller patches of giant kelp canopy at or near the surface compared to mechanical harvest. Mechanical harvest of giant kelp significantly alters the abundance of giant kelp relative to hand harvest, by removing large amounts of giant kelp canopy to a depth of approximately four feet, which can remove important canopy habitat and alter kelp forest communities (MLPA 2009b, MLPA 2010). Although it is unlikely that a recreational user would choose to mechanically harvest kelp given the current harvest regulations (10 pounds wet weight, tit 14 Cal. Code Regs. § 30.00), the proposed change would allow for mechanical kelp harvest in Kashtayit SMCA, which conflicts with the original intent of the MPA.

Additionally, the proposed change would make the Kashtayit SMCA regulations inconsistent with all other instances of recreational kelp harvest as an allowed use in the MPA regulations, which specify, "by hand" or "hand harvest." Mechanical harvest is associated with commercial kelp harvest in the MPA regulations and there are additional provisions in the commercial kelp harvest regulations (tit 14 Cal. Code Regs. § 165 and § 165.5) associated with mechanical harvest. It is likely the recreational bag limit for kelp harvest would serve as a de facto limit on the harvest method to hand only. However, would result in inconsistencies with all other allowances for recreational take of kelp in the MPA regulations, which could lead to confusion and enforcement challenges.

CDFW did not find information to support that the current regulations cause an enforcement challenge at Kashtayit SMCA or that the proposed change would address an MPA management challenge or would benefit the MPA or the MPA Network. Although the proposed change would simplify the regulations, there is no information to justify removing the existing protections for giant kelp or rock scallops and mussels from Kashtayit SMCA. Improving signage and outreach efforts for the current regulations could be just as effective, or more effective, than a regulatory change.

RECOMMENDATION FOR 2023-18MPA_3

Given these considerations, and the information in the evaluation below, **CDFW recommends CFGC DENY the petition action 2023-18MPA_3**:

- Simplify take regulations at Kashtayit SMCA to: "Recreational take of finfish, invertebrates ~~(except rock scallops and mussels)~~, and giant kelp ~~by hand harvest~~ is allowed."

EVALUATION NARRATIVE FOR 2023-18MPA_4 CHANGE COLOR OF NO-TAKE CAMPUS POINT SMCA FROM PURPLE TO RED ON MAPS

The petition states that depicting this No-take SMCA in red, consistent with SMRs, is likely a clearer indication that the MPA is a No-take area. Outreach and education are essential components of MPA management. This proposed action was in Bin 1, and CFGC supported it with an alternative pathway (CDFW 2025). This proposed action would not require a change to the MPA regulations to implement.

RECOMMENDATION FOR 2023-18MPA_4

Given these considerations, the petition action was not evaluated further and **CDFW recommends CFGC support petition action 2023-18MPA_4 with an alternative pathway.**

EVALUATION NARRATIVE FOR 2023-18MPA_5-7 SPECIAL CLOSURES

The petitioner has requested (1) the removal of San Miguel Island Special Closure, (2) the reduction in size of the brown pelican (*Pelecanus occidentalis*) fledgling area of Anacapa Island Special Closure, and (3) the removal of the Anacapa Island Special Closure, all within the Channel Islands National Marine Sanctuary. The petitioner states, "with a NMFS marine mammal station equipped with M2 radar onsite and large, stable pinniped populations present in this zone…consider whether the Special Closure remains a necessary sub-component of MPA design." The petitioner additionally states the boundary of the brown pelican fledgling area of the Anacapa Island Special Closure, "has interfered with the intended allowance for vessels to land safely at Frenchy's Cove," and that the Anacapa Island Special Closure, as a whole, "is based on depth along a steep, cliffside seabed area that is difficult to comply with and enforce." The petitioner states that, "given the extensive MPA and closure complex established to protect marine life including seabirds," the Anacapa Island Special Closure is not needed. However, given the information provided, the petitioner's stated solutions could not be substantiated as relevant or necessary, and CDFWs' evaluation finds the proposed change:

- Is inconsistent with the intent of these special closures, as defined during the Northern Channel Islands MPA planning process and subsequent MLPA Initiative planning process,
- Does not address a current or emerging MPA management challenge, and
- Would not advance management of the MPA Network.

Before the Northern Channel Islands MPA planning process, protections for birds and pinnipeds in these areas were already in place in the form of ecological reserves. During

the Northern Channel Islands MPA planning process, these special closures were intentionally designed to provide additional spatial protections in areas where specific wildlife species were highly vulnerable to disturbance. Around the Channel Islands, these closures serve a targeted conservation purpose beyond the broader protections of the MPA Network. Frenchy's Cove is a popular recreational and fishing destination on the western islet of Anacapa Island that includes a small beach and tidepools and is situated within both the island-wide nearshore Anacapa Special Closure and the larger Anacapa SMCA. Anacapa Island Special Closure, which prohibits the use of nets or traps within waters less than 20 feet deep around the island, was established primarily to protect feeding and roosting seabirds, including the California brown pelican. Within Anacapa Island Special Closure is the brown pelican fledgling area, designated from the mean high tide mark seaward to a water depth of 20 fathoms (120 feet) on the north side of West Anacapa Island, including Frenchy's Cove. The west and east borders of the brown pelican fledgling area are the west end of the beach at Frenchy's Cove and Portuguese Rock, which is approximately 0.8 miles to the east of the beach. The area prohibits public entry into the area from January 1 through October 31 to protect nesting birds, nests, and fledglings during brown pelican nesting season. Similarly, the San Miguel Island Special Closure provides critical protection for pinniped haul-out and breeding sites, one of the few such pinniped-focused closures in California. Subsequent to the Northern Channel Island MPA planning process, and during the MLPA Initiative planning process in the South Coast Region, these two special closures were left unchanged. Since that time, NOAA Sanctuaries has not indicated a change of intent regarding the protection status of these areas.

Pinniped populations at San Miguel Island fluctuate naturally due to factors such as domoic acid exposure and shifts in prey distribution. Given this variability, maintaining consistent spatial protections remains important to reduce human-related stressors that can compound natural population pressures. Although California sea lion populations have increased from historical lows (Carretta et al. 2019), current evidence does not demonstrate that pinnipeds at San Miguel Island, nor nesting seabirds at Anacapa Island, no longer require the protections provided by existing seasonal closures. The Channel Islands National Marine Sanctuary Condition Report (ONMS 2019) states that many living resources around the northern Channel Islands have shown stabilization or improvement since 2009. Making large changes to these areas may compromise this trend. At the time of the Northern Channel Islands MPA planning process, six species of pinnipeds were documented as having historically occurred in the northern Channel Islands, including four Otarids and two Phocids; two species, Steller sea lion (*Eumetopias jubata*), and Guadalupe fur seal (*Arctocephalus townsendi*) were identified as having occurred in the Sanctuary and were listed as threatened under the Endangered Species Act (NMFS 1985, 1990). Currently, the western distinct population segment of Steller sea lion is listed under the ESA as endangered and Guadalupe fur seal is listed under the ESA

as threatened. Thus, the protection offered to these and other pinnipeds by the San Miguel Special Closure remains relevant today.

Similarly, at the time of the Northern Channel Islands MPA planning process, the California brown pelican was listed as endangered the federal and California Endangered Species Acts. The California brown pelican's delisting under both acts in the late 2000s was followed by a period of prey scarcity and associated die-offs, underscoring the ongoing fragility of this species. The petitioner asserts that reducing the brown pelican closure at Anacapa Island to allow boat access to Frenchy's Cove reflects, "Regional Stakeholder Group (RSG) intent." However, no documentation has been provided to substantiate this claim, nor is such intent reflected in the historical MLPA record. It is important to clarify that seasonal boat access to Frenchy's Cove Beach in December and November on the west side of the cove was approved during the MLPA Initiative planning process and remains in effect today. Nesting and roosting seabirds are highly sensitive to human disturbance. The presence of vessels, as well as associated noise, lights, and fishing activity, can disrupt essential behaviors such as feeding, resting, or breeding (Wright et al. 2007). Brown pelicans are especially vulnerable to disturbance during the nesting season and depend on access to forage fishes like Pacific sardine (*Sardinops sagax*) and Northern anchovy (*Engraulis mordax*). Given that California brown pelicans are extremely sensitive to human disturbance and that their population dynamics are closely tied to fluctuations in forage fish prey availability and broader oceanic conditions, the protection offered by the Anacapa Island Special Closures are still relevant today.

The petitioner asserts that the eastern boundary of Anacapa Island Special Closure for brown pelican fledglings was intended by the Regional Stakeholder Group to allow boater access to a beach that is currently within the special closure. The public currently has access to the beach at Frenchy's Cove from the north seasonally for the months of November and December. Anacapa Island Special Closure has historically protected pelican fledglings since before CFGC adopted the Channel Islands MPAs in 2002. In the 2002 rulemaking, the eastern boundary of the Anacapa Island Special Closure was generally described as 345° magnetic off the western edge of Frenchy's Cove. In 2005, CFGC adopted a regulatory cleanup package where the Special Closure's language was moved from being within the specific MPAs sub-section to its own sub-section and the Special Closure received discrete coordinates for the boundaries. The eastern boundary of the Anacapa Island Special Closure aligned with the two MPAs at Anacapa Island via a line extending 000° True off the western edge of Frenchy's Cove (34° 00.4' N. lat. 119° 24.6' W. long., CFGC 2002a). During the MLPA planning process, the rulemaking made the boundaries more precise by including two additional decimal places (which defined the eastern boundary at 119° 24.600'). In 2015, CFGC adopted a rulemaking package that included additional boundary cleanups for the MPA Network, and they did not identify the

need to further adjust the boundary (CDFW 2015). The current boundaries, including the eastern boundary, align with the SAT guidelines, and are where they were intended to be. Any modification to these closures would require close coordination and agreement with federal partners, including agencies responsible for managing federally protected and listed species. Reducing protections at this time would be inconsistent with federal and state conservation mandates and ongoing collaborative efforts to safeguard vulnerable wildlife populations. The consequences of further boundary changes (e.g., negative impacts to pelicans and pinnipeds, public understanding, compliance, and enforcement) outweigh any potential benefits from improving public access.

RECOMMENDATION FOR 2023-18MPA_5, _6, and _7

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

- **2023-18MPA_5**, Eliminate pinniped special closure at San Miguel Island,
- **2023-18MPA_6**, Reduce the size of the brown pelican Anacapa Island Special Closure regulations to allow boat access to Frenchy's Cove, and
- **2023-18MPA_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"

EVALUATION QUESTIONS

2023-18MPA_1: REDESIGNATE A PORTION OF VANDENBERG SMR TO CREATE A NARROW SMCA ALONGSHORE FOR THE ENTIRE LENGTH OF VANDENBERG SMR THAT ALLOWS RECREATIONAL SHORE FISHING FOR FINFISH BY HOOK-AND-LINE.

QUESTION 1: DOES THE PROPOSED CHANGE SUPPORT THE MPA NETWORK IN MEETING ONE OR MORE OF THE MLPA GOALS AND ALIGN WITH MPA MASTER PLAN ADAPTIVE MANAGEMENT OBJECTIVES?

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

MPA Network management. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan objectives.

The proposed changes (petition 2023-18MPA_1 and 2022-04) do not support the MPA Network in meeting MLPA Goals, do not align with the MPA Master Plan adaptive management objectives, and thus do not advance management of the MPA Network. Vandenberg SMR was designed to meet MLPA Goals 1, 2, 3, 4, and 5.

The proposed changes in petitions 2023-18MPA and 2022-04 to redesignate a portion of this SMR to an SMCA to allow recreational take of fish is inconsistent with the goals of this MPA as defined during the MLPA MPA planning process and presented to CFGC when the resulting MPAs were adopted into regulation. These goals in part include: to "Protect area with high marine bird, marine mammal, fish, and invertebrate species diversity and abundance," to "protect natural age and size structure of Nearshore Fishery Management Plan species which occur within the central coast," to "protect ecosystem structure and functions in representative shallow habitat in southern end of central coast," to "help protect marine bird and marine mammal species of concern by protecting forage base adjacent to colonies and rookeries," and to "replicate with a state marine reserve the same range of habitats found at fished sites at Point Sal."

Granting this petition to redesignate a portion of this SMR would interfere with Vandenberg SMR's ability to meet these goals. Allowing take of finfish in a sandy beach habitat would cause the natural structure and function of the population of those fishes at the site to not be preserved. Both proposed options would result in the portion of the MPA the petitioners wish to redesignate having its LOP reduced from the current Very High to Moderate-low, which would result in this MPA losing its status as a habitat replicate for key nearshore habitats. The changes to the MPA would change the design, which could interfere with larval connectivity, particularly as the lee of Point Arguello (where Vandenberg SMR is located), is a likely larval retention area (Ohashi and Wang 2004, White et al. 2019). Furthermore, Vandenberg SMR protects the mouth of the Santa Ynez River, a historically significant spawning and nursery area for Southern California steelhead (Busby et al. 1996), which once supported the largest steelhead run in Southern California. MPAs near river mouths can provide important benefits for steelhead where they aggregate prior to upstream spawning (Simenstad & Cordell 2000).

Although redesignating a portion of Vandenberg SMR at Surf Beach to allow shore-based hook-and-line fishing aligns with MLPA Goal 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," this SMR was already designed to meet Goal 3 by improving study opportunities. It was designed to encompass an existing PISCO monitoring site, a Multi-

Agency Rocky Intertidal Network (MARINe) monitoring site, and a Point Blue Conservation Science study site, and was designed to serve as an unfished reference location (i.e., same range of habitats) to fished sites at Point Sal (MLPA 2006a).

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

No. The proposed changes (2023-18MPA_1 and 2022-04) do not advance adaptive management recommendations from the Decadal Management Review (DMR). See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

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

No. The creation of an alongshore ribbon SMCA or Surf Beach SMCA would create MPA management challenges, such as enforcement challenges (see Question 11), and compromise network connectivity (see Question 9).

Both petitioners state that the proposed changes would benefit equity of access to coastal resources in this area. Advancing justice, equity, diversity, and inclusion is a priority for CDFW and is beneficial for adaptively managing the MPA Network. Petition 2023-18MPA_1 asserts that the proposed changes would result in equitable access to shore fishing because the regulations are not currently being enforced consistently for military and non-military personnel. However, CDFW MED enforces the Vandenberg SMR regulations regardless of affiliation with Vandenberg SFB or other facets of the military. Redesignating an alongshore ribbon of this SMR, as proposed in 2023-18MPA_1, would not increase equitable access to the area because most of the alongshore ribbon is contained within the Vandenberg SFB, which is not accessible to the public.

In Petition 2022-04, the City of Lompoc states, “the City of Lompoc is a regionally isolated community and is also recognized as a disadvantaged community,” and that opening Surf Beach “would allow for families to once again fish for subsistence.” Redesignating the Surf Beach portion of Vandenberg SMR to an SMCA, as proposed by Petition 2022-04, would create an SMCA that could be equally accessed by base personnel and the public. However, based on the information available, CDFW was not able to determine whether the proposed change would advance justice or equitable access to fishing for a disadvantaged community (see Question 14). The outcomes from completing DMR recommendation 8, “Evaluate the accessibility of MPAs to various community

groups," could help address this question. However, CDFW has not started working on this DMR recommendation.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

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

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

Yes. Vandenberg SFB enforces annual seasonal restrictions and partial closures at Surf, Wall, and Minuteman beaches to protect the threatened western snowy plover during its nesting season (7 months, March 1 through Sept. 30, U.S. Space Force n.d.a., n.d.b.). The closures are federally mandated under the Endangered Species Act to protect the plover's nesting habitat and allow chicks to fledge. A section of Surf Beach usually remains open to the public, but visitors must stay out of posted, fenced-off nesting areas. Thus, both proposals would interact with this protection and have the potential to impact management activities.

NOAA Fisheries is responsible for implementing the Endangered Species Act for southern California steelhead. NOAA also collaborates with CDFW's Fisheries Branch on the California Monitoring Plan (Adams et al. 2011, Boughton et al. 2022). The California Monitoring Plan is designed to inform salmon and steelhead recovery, conservation, and management activities. The Santa Ynez River mouth, an historically important location for adult steelhead returning to spawn, is located within Vandenberg SMR just south of the Vandenberg SFB. Fishing is closed for steelhead in the Santa Ynez River. Opening shore-based hook-and-line fishing within Vandenberg SMR has the potential to interact with this protection (i.e., steelhead returning to spawn at the river mouth) and would introduce confounding factors into ongoing monitoring efforts. Southern California steelhead are listed as Endangered under the federal ESA and CESA.

In 2024, a 2019 State Water Resources Control Board order was upheld that required the U.S. Bureau of Reclamation (Reclamation) to study steelhead passage around Bradbury Dam on the Santa Ynez River. The order to comply with state law, which includes evaluating options like fish ladders, etc. to help steelhead access critical upstream spawning and rearing habitats, gave 24 months for Reclamation to complete the study. Opening shore-based hook-and-line fishing within Vandenberg SMR has the potential to

interact with adult steelhead returning to the river to spawn and the success of future upstream habitat restoration efforts.

Since the establishment of Vandenberg SMR, the Chumash Heritage National Marine Sanctuary was established, which encompasses the MPA. Any regulatory changes to Vandenberg SMR may require CFGC to consult with Sanctuary staff.

There are State Lands Commission leases and Bureau of Ocean Energy Management pipelines that overlap with this SMR, but we do not anticipate they would be affected by this proposed change, as they are related to offshore oil and gas activities.

County of Santa Barbara Parks Division manages portions of the beach and Ocean Park, a park on the shoreline at Surf Beach. County Rangers support enforcement of the snowy plover closures. They may experience impacts associated with increased visitation and may need additional resources to support management activities.

County of Santa Barbara Public Works maintains restroom and park structures at Surf Beach and Ocean Park. They may experience impacts associated with increased visitation and may need additional resources to support management activities.

Southern Pacific Railroad operates the Lompoc Surf Train Station, which is directly adjacent to surf beach, as well as the associated parking lot and leased area for the tracks.

If 2023-18MPA_1 is approved, a pathway to the beach would have to be created as currently there is no safe passage from Ocean Park to the beach, in part due to the train tracks. This would require coordination with many entities, including the Coastal Commission, Southern Pacific Railroad, County of Santa Barbara Parks Division, and County of Santa Barbara Public Works.

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

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

Yes. CDFW has adequate information to evaluate and make a recommendation on both proposals. When evaluating the petitions, CDFW reviewed the information in the petitions as well as information including but not limited to:

- The petition from the City of Lompoc, which speaks to the rationale for the proposed change,

- The location of Vandenberg Space Force Base and its annual beach closures (U.S. Space Force n.d.a. and n.d.b.),
- The California Coastal Access, Facilities, Amenities, and Parking Dashboard (Patsch and Reineman 2023),
- California Marine Life Protection Act Initiative Central Coast Project Side-by-Side Comparison of Proposed MPA Packages 1, 2R and 3R (MLPA 2006b), and
- CFGC Preferred Alternative for Implementation of the MLPA in the Central California Coast Region (MLPA 2006a).

Given the limited information in the petitions, the data readily available to CDFW, and the evaluation timeline, CDFW was unable to analyze determine whether Vandenberg SMR is affecting access to subsistence fishing for a historically marginalized or underserved community (See response to Question 14 in Attachment 1). One of the Justice, Equity, Diversity, and Inclusion recommendations of the DMR is to "Evaluate the accessibility of MPAs to various community groups." This evaluation could include an assessment of the communities near the City of Lompoc, identify potential regional equity and access issues in the MPA Network, and identify potential solutions. This evaluation was not feasible within the constraints of the petition evaluation process and implementing a site-specific redesignation without this assessment would be premature.

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

No. CDFW has sufficient management information to proceed with the evaluation of this proposed change, including the foundational principles and information on the management of habitat and species present in the area of the MPA.

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

No. During the Central Coast MLPA Initiative planning process, the three alternatives designed by the Regional Stakeholder Group (RSG) maintained and expanded the pre-existing Vandenburg SMR into one SMR or two larger SMRs (MLPA 2006b). An SMCA that allowed recreational fishing within Vandenberg SMR was never considered; however, options 2R and 3R included two separate SMRs that were north and south of Surf Beach. Proposals 2R and 3R both protected the Santa Ynez river mouth, but they would have had an area in between them (including Surf Beach) where commercial and recreational fishing would have been permitted, including hook-and-line fishing from shore.

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

No. The information that the petitioners cite as warranting reevaluation is:

- For 2023-18MPA_1: Inequitable enforcement of SMR regulations between base personnel and non-base personnel since the establishment of the SMR.
    - CDFW MED enforces Vandenberg SMR's regulations regardless of any individual's affiliation with Vandenberg SFB.
- For 2022-04: Loss of valuable opportunities to subsistence fish and recreate, and negative financial impacts to the community from loss of fishing tourism.
    - The petitioner states these impacts but does not include any data or supplemental information to validate this assertion. As stated above, one of the recommendations in the DMR is to "Evaluate the accessibility of MPAs to various community groups." This evaluation could include an assessment of the communities near the City of Lompoc, identify potential regional equity and access issues in the MPA Network, and identify potential solutions. This type of evaluation for the City of Lompoc was not feasible within the constraints of the petition evaluation process and implementing a site-specific redesignation without this assessment would be premature.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. Opening this area to take, as proposed by the petitioner or as proposed by the City of Lompoc in Petition 2022-04, conflicts with the intent of Vandenberg SMR. The MPA was designed as an SMR with the intent of meeting several Central Coast Regional Goals, all of which are still relevant today:

- Protect area with high marine bird, mammal, fish, and invertebrate species diversity and abundance. (Goal 1),
- Protect communities associated with an area that has unique oceanographic conditions in a transition zone near a biogeographical regional boundary, including sandy beach, rocky intertidal, kelp forest, and hard and soft bottom habitat, and near each other. (Goal 1),
- Protect natural age and size structure of CDFW Nearshore Fishery Management Plan species that occur within the central coast. (Goal 1),

- Protect trophic structure and food web in an area representative of shallow habitats south of Morro Bay. (Goal 1),
- Protect ecosystem structure and functions in representative shallow habitat in southern end of central coast. (Goal 1),
- Increase ecological benefits to an area containing a mosaic of shallow hard and soft bottom habitats through the expansion of an existing state marine reserve. (Goal 1),
- Help protect marine bird and marine mammal species of concern by protecting the forage base adjacent to colonies and rookeries. (Goal 2),
- Protect larval sources and enhance reproductive capacity of benthic fishes, invertebrates, and coastal pelagic finfish. (Goal 2),
- Establish a state marine reserve which encompasses an existing PISCO monitoring site, a Multi-Agency Intertidal Network (MARINe) monitoring site, and a Point Blue Conservation Science study site. (Goal 3),
- Replicate with a state marine reserve the same range of habitats found at fished sites at Point Sal. (Goal 3),
- Include and replicate within a state marine reserve sandy beach, rocky intertidal, and shallow hard and soft bottom habitats. (Goal 4), and
- Establish a state marine reserve that meets preferred Master Plan Framework scientific guidelines for size. (Goal 5).

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

No. The MLPA requires that the design of individual MPAs and the statewide Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The science guidelines developed by the Science Advisory Team and outlined in the Master Plan were created specifically to provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with these guidelines depends on LOP, which is determined by allowed take, and spatial configuration. More specifically, these guidelines require that an MPA must be at least 9 square miles and meet one of the three highest LOPs (i.e., Very High, High, or Moderate-high) to contribute to ecological goals such as habitat replication and representation. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

Only MPAs that encompass the full range of depths from 0-30 m are likely to include the complete suite of biodiversity associated with these nearshore habitats. For this reason, the SAT only considers those MPAs or MPA clusters that encompass the entire depth zone,

from the shoreline to 30 m depth, to contribute toward representation of nearshore habitats (0-30 m rock, 0-30 m soft bottom, and kelp) in the MPA Network. In cases where the 0-30 m depth zone is split across multiple MPAs with different levels of protection, these nearshore habitats are evaluated at the lowest LOP afforded within the 0-30 m depth zone. For example, shoreline or "ribbon" MPAs that confine uses to a narrow band along the shoreline may lower the LOP afforded to the shallowest portion of the 0-30 m depth zone and alter the unique marine communities specific to this depth zone. Furthermore, take activities allowed within the ribbon MPA may alter the abundances of species across the entire 0-30 m zone if the species utilize a range of depths either through movement of individuals or through seasonal or ontogenetic shifts in habitat use. Thus, in the case of an MPA configuration that includes an offshore MPA with a higher LOP and a nearshore ribbon MPA with a lower LOP, representation of nearshore (0-30 m) habitats will be assessed at the lower LOP assigned to the ribbon MPA.

Vandenberg SMR currently meets both minimum criteria and thus currently contributes to foundational ecological network objectives. It contributes to habitat replication for kelp, beach, rocky intertidal, hard substrate (0-30 m depth), and soft substrate (0-30 and 30-100 m depths) habitats. See Table 1 for more information on habitat in Vandenberg SMR.

Reclassifying the SMR's alongshore span (2023-18MPA_1) or a portion within the SMR (2022-04) to an SMCA to allow shore-based hook-and-line fishing would reduce the LOP of the redesignated portion of the MPA from Very High to Moderate-low. Additional take allowances (e.g., sand crab for bait) would further reduce the LOP. Both proposed changes would also decrease habitat replication and representation, increase spacing between habitat types (namely, kelp, beach, rocky intertidal, and hard and soft substrate from 0 to 30 m depth), and diminish the Network's overall ability to meet MLPA Goals.

Thus, granting either proposal has the potential to compromise Vandenberg SMR's ability to serve its intended function in the MPA Network. As such, implementation would not improve the design of this MPA or the MPA Network, nor would it enhance alignment with MPA science guidelines.

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

No. Both proposals (2023-18MPA_1 or 2022-04) would not align with Feasibility Guidelines related to Take Regulations, MPA Boundaries, MPA Types, Awkward Shapes and Wedges, and MPA Cluster Orientation. Non-adherence with these guidelines impacts enforceability. See Question 10a of Attachment 1 for CDFW Feasibility Guidelines.

This area is highly frequented by white shark (*Carcharodon carcharias*), which are fully protected in California waters. As such, granting either proposal may require additional regulatory language to restrict gear types and shore-based shark fishing to limit white shark fishery interactions. The requested take allowance of, "Sand Perch and/or similar species and take of sand crabs" to use for bait would also increase regulatory complexity. These could lead to conflict with feasibility criteria related to Take Regulations, which state that complex regulations such as "those which preclude some uses while allowing other uses that are very similar" or "those which include technical or complex prohibitions" should be avoided.

The offshore ribbon boundary requested in this petition (2023-18MPA_1) would conflict with guidance to avoid curved or undulating lines and not straight lines of latitude or longitude and to "avoid using depth contours and distance offshore." Additionally, a shore-based fishing allowance within an existing SMR conflicts with guidance that "take regulations proposed for an MPA should reflect the proposed MPA type." It also conflicts with "Multiple zoning" guidance that MPAs should avoid abrupt transitions from highly protected areas to areas of relatively little protection (i.e., Moderate-low or Low LOPs). Guidance on multiple zoning states, "Problems are likely to occur when confusing differences in regulations occur over small spatial areas. This can lead to unintentional infractions and can reduce public understanding," and "Three particular types of multiple zoning that should be avoided are the creation of "doughnut zones" [as proposed in Petition 2022-04], L-shaped MPAs, and "ribbons" [as proposed in Petition. 2023-18MPA]."

Finally, creating different regulations or classifications that share a boundary are referred to as a "cluster." Thus, both petition proposals would result in a cluster oriented east/west (or an east/west portion of the MPA), which conflicts with guidance to orient MPA clusters in an alongshore arrangement (stacked north/south).

> **QUESTION 10B:** IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?
>
> **No.** There is no rationale for moving forward with either petition (2023-18MPA_1 or 2022-04) or an alternative.

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

No. The proposed changes in both petitions (i.e., Reclassifying all or part of the SMR's alongshore span to an SMCA that allows shore-based hook-and-line fishing) do not maintain or improve enforceability of these MPA regulations. The proposal in both petitions (2023-18MPA_1 and 2022-04) has the potential to increase complexity of

enforcement by having different MPA classifications with different regulations in close proximity.

Allowing take of "Sand Perch and/or similar species and take of Sand Crabs" as proposed by petition 2022-04 would increase enforcement burden. Allowing take of specific surf species but not other species of fish would increase enforcement burden as it would require CDFW MED to enforce specific individual behaviors. Allowing take of sand crabs would allow digging that could disguise take of other invertebrates such as Pismo clams, making it difficult to gauge compliance at a distance. Additionally, white shark, which are fully protected in California, frequent the area. Granting either petition would likely require additional regulatory language to restrict gear types and shore-based shark fishing to limit white shark fishery interactions, which could further add to enforcement complexity.

Both proposals have the potential to further complicate enforcement due to the lack of existing permanent onshore landmarks to inform boundaries at the site, including boundaries for Vandenberg SFB and the western snowy plover closure. This has the potential to increase unintentional noncompliance by users.

Finally, the two proposals deviate from several CDFW Feasibility Guidelines, which also could decrease enforceability of MPA regulations (see Question 10 for more information on the Feasibility guidelines and concerns related to regulatory complexity).

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

No. The proposal in both petitions (2023-18MPA_1 or 2022-04) would not simplify regulatory language or enhance public understanding, and both would change the intent of the MPA.

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

No. Petition 2023-18MPA_1 would reduce protection for marine resources by allowing shore-based hook-and-line fishing. Petition 2022-04 would reduce protection for marine resources by allowing take of "Sand Perch and/or similar species and take of Sand Crabs" for bait on a half-mile onshore portion of the Vandenberg SMR at Surf Beach. Either option would allow take in what is currently a No-take SMR and therefore lower the overall LOP from Very High to Moderate-low in that portion of the MPA (see Question 9 on how each proposal conflicts with MPA science guidelines).

Two species in the area, southern California steelhead and western snowy plover, are listed as Endangered and Threatened, respectively, under the federal Endangered Species Act. Southern California steelhead are also listed as Endangered under CESA. Both proposals have the potential to reduce protection and impact ongoing monitoring and restoration efforts for these sensitive species (see Question 4 for potential interactions with non-FGC management and activities). Additionally, white shark, which are fully protected in California, frequent the area. Granting either petition would likely introduce the potential for damage to white sharks via interactions with fishing gear and would require additional regulatory language to restrict gear types and shore-based shark fishing to limit white shark fishery interactions.

Redesignating the whole sandy beach portion of Vandenberg SMR would significantly reduce protections for the sandy beach ecosystem therein and also reduce replication for that type of ecosystem in the MPA Network. Additionally, redesignating the whole alongshore portion of Vandenberg SMR would include redesignating the area around the Santa Ynez River mouth, one of the ecological resources this MPA was designed to protect.

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?

Petition 2023-18MPA states that this proposed change would be for the purpose of equity and access. The City of Lompoc states in petition 2022-04 that their community is disadvantaged, and that access to no or low-cost opportunities to recreate and subsistence fish would benefit their community. CDFW reviewed available data and conducted and initial assessment, but there is a need to conduct a broader assessment to determine if the change would maintain or enhance access (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities. See Question 14 of Attachment 1.

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

Yes. Proposals in both petitions (2023-18MPA_1 and 2022-04) would allow recreational shore-based hook-and-line fishing in an MPA that is currently closed to all fishing. Consumptive use by recreational and/or subsistence anglers would be expected to increase, particularly for residents of Lompoc, given it is the closest city.

It is unknown if or how existing long-term MPA monitoring, a non-consumptive activity, would be affected.

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

See Question 16 of Attachment 1.

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

The proposed change would increase fishing access for the recreational fishing community, particularly for Lompoc residents (~9 mi from area of proposed change). However, impact to nearest fishing community port of Santa Barbara (located >50 mi from area of proposed change) is anticipated to be unlikely. See Question 17 of Attachment 1 for additional context on CFGC's response.

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

No. This petition does not directly interact with any other proposed changes in other 2023 MPA petitions. However, both petitions (2023-18MPA_1 and 2022-04) have potential to indirectly interact with 2023-28MPA, which proposes a new SMCA at Point Sal. That petition would create a protected area around the closest coastal access point north of Vandenberg SMR and Vandenberg SFB. The petitioner for that petition proposes an SMCA at Point Sal which would allow tribal take and recreational take of finfish by hook-and-line from shore. Additionally, one of Vandenberg SMR's objectives established during the Central Coast MLPA Initiative planning process was to "Replicate with a state marine reserve the same range of habitats found at fished sites at Point Sal."

2023-18MPA_3: AT KASHTAYIT SMCA, SIMPLIFY TAKE REGULATIONS TO: "RECREATIONAL TAKE OF FINFISH, INVERTEBRATES ~~(EXCEPT ROCK SCALLOPS AND MUSSELS)~~, AND GIANT KELP ~~BY HAND HARVEST~~ IS ALLOWED."

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 a whole. As such, CDFW has evaluated this action within the broader adaptive management framework and how the proposed action may or may not align with the MLPA Goals/Master Plan objectives and

advance MPA Network management. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan objectives.

This proposed change, to allow take of mussels and rock scallops and recreational mechanical harvest of giant kelp at Kashtayit SMCA, would not advance management of the MPA Network. The proposed change is inconsistent with the goals of these MPAs defined during the MLPA Initiative planning process and presented to CFGC when the resulting MPAs were adopted into regulation. This MPA was designed to meet MLPA Goals 3, 5, and 6. The proposed change would reduce this MPA's ability to meet some of those goals.

Changing these regulations would reduce the MPA's ability to meet MLPA Goal 3 because it would increase human disturbance and be inconsistent with protecting biodiversity. Mussels and giant kelp are structure-forming species that are important to the formation of marine ecosystems because the structures they form create secondary habitat for other species (Teagle et al. 2017, Cameron et al. 2024; MLPA 2010). Allowing or increasing take of mussels and giant kelp could reduce habitat availability for other species in the ecosystem, potentially reducing the biodiversity of the ecosystem.

The proposed change would also reduce the MPA's ability to meet MLPA Goal 5 as the MPA would no longer meet the clearly defined objectives established during the MLPA MPA design process. Kashtayit SMCA was intended to allow low-impact recreational take, especially take in line with traditional Chumash practices. The proposed change would increase the impact of take, which is inconsistent with this objective, and the intended goals of this MPA as designed in the planning process (MLPA, 2009a). Additionally, the proposed change to allow mechanical take in addition to hand harvest of giant kelp has an increased impact on the environment, as outlined in the MLPA (2009b).

The proposed change is not expected to affect the MPA's ability to meet MLPA Goal 6. Kashtayit SMCA does not currently meet size or protection thresholds to count towards network connectivity. This proposed change would not change that.

The proposed change would also conflict with the MPA Master Plan adaptive management objective to "Protect the structure and function of marine ecosystems." Increasing the take allowance and reducing protections for rock scallops and mussels and potentially giant kelp has the potential for impacts to the larger ecosystem. As mentioned above, mussels and giant kelp are structure-forming species that create habitat. Take of these species could lead to habitat loss due to damage to the physical environment during harvest or the loss of these species' function in the ecosystem as habitat-forming species. For example, take of scallops can damage substrate, as one

method of take requires prying them off the rock with an abalone iron (CDFG 2001). Therefore, allowing take would interfere with the structure and function of the ecosystem.

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

No. The change proposed in this petition does not advance any of the adaptive management recommendations in the Decadal Management Review. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

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

No. The proposed change would not address a current or emerging MPA management challenge or advance management of the MPA Network. Although the proposal aims to simplify regulatory language, and clear understandable regulatory language is a goal of management, the ecological costs outweigh any potential benefits. Improving signage and outreach efforts for the current regulations could be just as effective, or more effective, than a regulatory change.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

Yes. CFGC manages kelp harvest in the state and uses spatial units called Administrative Kelp Beds to track commercial kelp harvest. Kashtayit SMCA is located within the area designated as Administrative Kelp Bed 31. Two different commercial entities have a CFGC approved kelp harvest plan for mechanical harvest of giant kelp in Administrative Kelp Bed 31, but not within Kashtayit SMCA. While the change proposed, if granted, would technically allow either mechanical or hand harvest within Kashtayit SMCA, it would still be limited to recreational harvest of giant kelp and subject to current bag limits. Although it is unlikely recreational harvesters would use mechanical means given the current bag limit (10 pounds per person per day), the proposed change would theoretically allow for recreational mechanical harvest. Commercial harvest of giant kelp by hand or mechanical means would still be prohibited within Kashtayit SMCA. The proposed change would require additional outreach and coordination with commercial and recreational kelp harvesters to ensure the change in regulations is adequately understood.

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

Yes. This MPA is adjacent to Gaviota State Park. Any changes made to regulations in this area may require consultation or coordination with State Parks.

Since the establishment of this MPA, the Chumash Heritage National Marine Sanctuary was established, which encompasses this MPA. Any changes to this MPA may require consultation or coordination with sanctuary staff.

There is a State Lands Commission lease for the Gaviota Pier, but we do not anticipate that this proposed change would interact with that lease.

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

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

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

- The MLPA designation documents, which indicate the intent behind the allowed activities in the Kashtayit SMCA (MLPA 2009a),
- Scientific research on the ecosystem role of mussels and kelp as ecosystem-forming species (Teagle et al. 2017, Cameron et al. 2024), and
- The intent of the designers of this MPA from the original MLPA planning process (MLPA 2009b, MLPA 2010).

The information in the petition and other information CDFW reviewed did not demonstrate that the proposed change is relevant to MPA adaptive management or that a change to the MPA regulations is warranted.

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

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

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

Yes. Prior to the establishment of Kashtayit SMCA, this area was Refugio SMCA,[3] which allowed among other things, recreational take of rock scallops and mussels. These changes to the Refugio SMCA language were considered by the BRTF, and vetted through the Regional Stakeholder Group, and the language was identified in the MLPA South Coast Integrated Preferred Alternative, which was adopted by CFGC for Kashtayit SMCA. During the MLPA planning process, the BRTF recommended an alternative to update the take allowances to protect the local abundance of rock scallops, mussels, and giant kelp, and exclude harvest of rock scallops and mussels because of the potential to damage the rocks or other substrate during harvest, which can alter community structure and result in permanent habitat loss. Additionally, the integrated preferred alternative included recreational take of giant kelp by hand. During the MLPA planning process, the BRTF carefully selected commercial or recreational take of kelp, and mechanical and/or hand harvest of kelp for each MPA based on the MPA-specific goals. The BRTF highlighted that mechanical harvest of giant kelp has greater impacts to kelp abundance, kelp canopy, and kelp ecosystems than hand harvest (MLPA 2009b). Every occurrence of recreational take of kelp in the MPA regulations specifies "by hand" or "hand harvest;" mechanical harvest of kelp is associated with commercial take in the MPA regulations and commercial kelp regulations (Cal. Code Regs. Section 165 and 165.5). The inclusion of "giant kelp by hand" in the Kashtayit SMCA regulations is intentional.

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

No. There is no new information that warrants reevaluation of the proposed change.

[3] Refugio SMCA: "Prohibits all recreational take except for chiones, clams, cockles, rock scallops, native oysters, crabs, lobsters, ghost shrimp, sea urchins, mussels, worms, and finfish. Prohibits all commercial take except for algae (except giant kelp and bull kelp); crabs, ghost shrimp, jackknife clams, sea urchins, worms, and finfish."

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. This proposed change does not align with the original intent of the MPA identified during the MLPA Initiative planning process. This MPA was intended to allow low-impact recreational take, especially take in line with traditional Chumash practices (MLPA 2009a). The proposed change would increase take allowance and reduce protections for rock scallops, mussels, and potentially giant kelp. The proposed change could lead to permanent habitat loss due to damage to the physical environment during harvest of rock scallops and mussels, which support the broader ecosystem as structure-forming species that create habitat for other species. Additionally, throughout the MPA regulations, "hand harvest" is specified for recreational take of Macrocystis. This was an intentional decision during the MLPA planning process. Although it is unlikely recreational harvesters would use mechanical harvest for the current 10 pound bag limit, the proposed change does not align with the original intent of the MPA and would introduce regulatory inconsistency in the MPA regulations. The proposed change would also increase impacts on the ecosystem and conflict with the low-impact take envisioned during the planning process.

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

No. The MLPA requires that the design of individual MPAs and the statewide Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The science guidelines developed by the Science Advisory Team and outlined in the Master Plan were created specifically to provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with these guidelines depends on LOP, which is determined by allowed take, and spatial configuration. More specifically, these guidelines require that an MPA must be at least 9 square miles and meet one of the three highest LOPs (i.e., Very High, High, or Moderate-high) to contribute to ecological goals such as habitat replication and representation. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

Kashtayit SMCA does not currently meet the minimum criteria for LOP or size. Because the proposal to change the regulations would not increase the size and would, in fact, decrease the LOP of this MPA, implementation would not enhance alignment with MLPA Science Guidelines. Rather, the proposed change would compromise the design of Kashtayit SMCA and would not improve the MPA Network design.

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

Yes. The Take Regulations section of the Feasibility Guidelines stipulates that complex regulations should be avoided, including those that preclude some uses while allowing other uses that are very similar. The change proposed in this petition may improve alignment with the Take Regulations section in the Feasibility Guidelines by reducing the complexity of the Kashtayit SMCA regulations. See Question 10a of Attachment 1 for CDFW Feasibility Guidelines.

> ### **QUESTION 10B:** IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?
>
> **Not applicable.**

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

In general, reducing complexity of the take allowances in the MPA could improve enforceability after a period of outreach and education associated with the regulatory change. However, the proposed change would result in unique regulations for recreational kelp harvest in Kashtayit SMCA that would be inconsistent with all other recreational take of kelp in the MPA regulations, which may present an enforcement challenge.

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

No. Although the change proposed in this petition makes the regulatory language simpler, the simplifying change has a substantive effect. This would change the intent of the MPA by increasing types and methods of allowable take, which conflicts with the original intent.

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

No. The proposed change would reduce protection for marine resources by allowing take of resources which are currently protected, including rock scallops, mussels, and giant kelp. Furthermore, this change might have compounding effects on marine resources, as removal of habitat structure (damage caused to hard substrate when harvesting rock scallops and mussels), including biogenic habitat (removal of scallops, mussels, and giant kelp), affects community structure and function (Teagle et al. 2017, Cameron et al. 2024).

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

See Question 14 of attachment 1.

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

Yes. If granted, the proposed change would likely increase take of rock scallops and mussels in the SMCA.

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

See Question 16 of Attachment 1.

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

The proposed change attempts to reduce regulatory complexity for the recreational fishing community. This would advance the CFC policy commitment to "increasing understanding and compliance and reducing enforcement burdens." However, impact on a nearby coastal fishing community (Santa Barbara, ~20 nautical miles south from area of proposed change) is anticipated to be unlikely. See Question 17 of Attachment 1 for additional context on CFGC's response.

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

Yes. Petitions 2023-19MPA (SYBCI, Chitqawi) and 2023-20MPA (SYBCI, Point Buchon) are proposing to use current Kashtayit SMCA regulations and the tribal take exemption for Santa Ynez Band of Chumash Indians in new or amended MPAs.

2023-18MPA_5-7: ELIMINATE SAN MIGUEL ISLAND AND ANACAPA ISLAND SPECIAL CLOSURES, REDUCE THE SIZE OF THE BROWN PELICAN FLEDGLING AREA AT ANACAPA ISLAND

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?

Goals of the MLPA are specific to MPAs and do not apply to the MPA Network's special closures, which were areas adopted by CFGC and prohibit access or restrict boating

activities in waters adjacent to sea bird rookeries or marine mammal haul-out sites. While special closures are not MPAs, they do support MLPA Goals by protecting marine life, and the abolishment or reduction of these special closures would not contribute to the Goals of the MLPA. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan objectives.

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

No. The proposed change does not advance adaptive management recommendations from the Decadal Management Review. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

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

No. The proposed change does not address a current or emerging MPA management challenge. The petitioner's stated intent for the proposed changes is to remove protection for pinnipeds and seabirds, pointing to recovered pinniped populations and that Anacapa Island SMCA and SMR already provide protection for seabirds, making the closures unnecessary. However, the petition does not provide any evidence to indicate the special closures are unnecessary. Additionally, the petitioner asserts the original intent at Anacapa Island during the planning process was to allow boating access at Frenchy's Cove. Boating access was discussed during the Northern Channel Islands MPA planning process and access is allowed seasonally at Frenchy's Cove. There is no new information that points to a need for reducing the size of the brown pelican special closure to increase boating access.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

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

Additionally, in 2014 a petition was submitted to evaluate use of special closures in the Central Coast Region; however, the action was dropped after the petitioner failed to follow up on a revised and refined proposal through stakeholder and agency workgroup effort (see CDFW 2022, Appendix G, Table 3).

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

Yes. The three northern Channel Islands special closures overlap with the Channel Islands National Marine Sanctuary. Any modifications to or removal of the special closures would affect federal management and research efforts and would require consultation with the Office of the National Marine Sanctuary and National Park Service. The special closure on San Miguel Island and the two special closures on Anacapa Island provide a buffer zone between human activity and marine mammal haul-out and sea bird nesting sites. Additional federal enforcement may be required to further monitor and enforce issues related to the Marine Mammal Protection Act and the Migratory Bird Treaty Act should these special closures be removed or modified.

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

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

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

- History of the Community-Based Process on Marine Reserves at the Northern Channel Islands National Marine Sanctuary 1999-2001 (MRWG 2002),
- The CEQA documents that accompanied the original rulemaking establishing these MPAs (CDFG 2002a & 2002b),
- The Channel Islands National Marine Sanctuary Condition Report (ONMS 2019),
- NOAA Fisheries California sea lion census data (NMFS 2019),
- NOAA's final rule on the marine reserves inside the Northern Channel Islands National Marine Sanctuary (NOAA 2007)

This information, along with other information CDFW reviewed, did not demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

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

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

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

Yes. During the Northern Channel Islands MPA planning process, the San Miguel Special Closure replaced the existing San Miguel Island Ecological Reserve, which incorporated the reserve's existing restrictions on boating and access to continue protections for pinnipeds to haul out (CDFG 2002b, Appendix 4). Similarly, the Anacapa Island Special Closure replaced the existing Anacapa Island Ecological Reserve, which also incorporated the existing provision for no net or trap to be used in waters less than 20 feet deep, as well as the brown pelican fledgling area (CDFG 2002b, Appendix 4). This smaller area within the island-wide Anacapa Island Special Closure prohibits public access from January 1 through October 31 to protect nesting birds, nests, and fledglings during brown pelican nesting season. Subsequently, during the MLPA Initiative planning process, and following CFGC guidance, both the San Miguel and Anacapa Island Special Closures were incorporated without modification into South Coast MPAs (CFGC 2002b). Thus, the areas within the affected Special Closures were evaluated and retained through both the Channel Islands and MLPA Initiative planning processes.

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

No. There is no new information or changed conditions that warrants reevaluating or modifying these special closures. The petitioner points to recovered pinniped populations and that Anacapa Island SMCA and SMR already provide protection for seabirds, making the San Miguel and Anacapa Island special closures unnecessary. Although some populations have increased since the closures were designated, sufficient evidence was not presented to justify removing or modifying the protections currently in place. See the response to Question 8 for more information on original intent identified during the implementation process of the MPAs around the Northern Channel Islands.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. Reducing or abolishing these special closures would conflict with the intent of their establishment. Special closures serve to buffer and provide additional protection from the impacts of human disturbance for sea birds, marine mammals, and other marine life. San Miguel Island Special Closure protects some of the largest seal and sea lion

rookeries along the west coast of the United States. The Anacapa Island Special Closure protects nesting seabirds year-round, with an additional seasonal brown pelican fledgling area that is designated from the mean high tide mark seaward to a water depth of 20 fathoms (120 feet) on the north side of West Anacapa Island. This seasonal closure allows protection for brown pelicans during nesting season (from January 1 through October 31), while allowing boat access during less sensitive times of the year.

During the Northern Channel Islands MPA planning process, the California brown pelican and Northern fur seal (*Callorhinus ursinus*) were identified as species of interest for consideration by the Marine Reserves Working Group. Additionally, Steller sea lion and Guadalupe fur seal were identified as having occurred in the Channel Islands National Marine Sanctuary and were listed as threatened under the Endangered Species Act (NMFS 1985, 1990). Currently, the western distinct population segment of Steller sea lion is listed under the ESA as endangered and Guadalupe fur seal is listed under the ESA as threatened (NMFS 1985, 1990). Though the California brown pelican was delisted under the ESA in 2009, they are extremely sensitive to human disturbance. Thus, the protection offered by the San Miguel Island and Anacapa Island special closures is still relevant today.

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

No. The MPA science guidelines only apply to MPAs. The proposals to eliminate, reduce, or remove special closures would not improve the design of the MPA Network or enhance alignment with MLPA Science Guidelines. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

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

Not applicable. CDFW Feasibility Guidelines only apply to MPAs and the proposed change does not apply to an MPA. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

QUESTION 10B: IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?

Not applicable. CDFW Feasibility Guidelines only apply to MPAs and the proposed change does not apply to an MPA.

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

2023-18MPA_5&6:

No. The proposed change would not maintain or enhance enforceability, as compliance is not a concern at these two closures.

2023-18MPA_7:

No. The proposed change would not enhance enforceability. Enforcement officer observations indicate that traps at this location are not typically set shallower than 20 feet deep. Traps that are found in shallow depths in this area are reported to be associated with inclement weather.

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

No. The petitioner asserts the guiding rationale for eliminating the special closures at Anacapa and San Miguel islands "simplifies regulatory language"; however, proposed action changes the intent of the regulations. Improved public understanding could instead be achieved through enhanced outreach and education.

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

No. The proposed elimination and/or reduction in size of the Anacapa and San Miguel Island Special Closures decreases protection for marine resources, particularly by reducing nesting and fledgling habitat for the California brown pelican and haul out sites for two pinniped species, Stellar sea lion and Guadalupe fur seal, which are currently listed under the ESA as endangered and threatened, respectively (NMFS 1985, 1990).

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

See Question 14 of Attachment 1.

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

Yes. The proposed change (i.e. elimination of a special closure and/or changing its boundaries) is expected to increase boating (non-consumptive) and fishing (consumptive) activities in the affected areas. It also has the potential to impact any

existing research and monitoring (non-consumptive) of California brown pelican and pinniped populations at either Anacapa Island Special Closure, San Miguel Island Special Closure, or both.

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

See Question 16 of Attachment 1.

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

The following analyses were prepared by CFGC staff. See Question 17 of Attachment 1 for additional context on CFGC's responses.

2023-18MPA_5: Eliminate pinniped Special Closure at San Miguel Island

The proposed change attempts to reduce regulatory complexity, particularly for boat-based fishing participants homeported to the coastal fishing communities of:

- Santa Barbara (~ 55 n mi from area of proposed change), and
- Channel Islands Harbor (Oxnard, ~60 n mi away from area of proposed change).

This proposed change could advance the CFC policy by potentially increasing understanding of regulations.

2023-18MPA_6: Reduce the size of the brown pelican Anacapa Island Special Closure to allow boat access to Frenchy's Cove

The proposed change would increase fishing and safe harbor access, particularly for boat-based fishing participants homeported in the coastal fishing communities of:

- Channel Islands Harbor (Oxnard),
- Ventura Harbor (~10 n mi away from area of proposed change), and/or
- Santa Barbara (~25 n mi area of proposed change).

Frenchy's Cove is a key anchorage on the island's north side that provides some protection from the west wind and swell; the next-nearest protected anchorage is ~10 n mi eastward, at Santa Cruz Island. Opening access for the 10 months currently closed may support safe anchorage for commercial fishing vessels that homeport in Oxnard, Santa Barbara, and/or Ventura.

2023-18MPA_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"

Impacts, if any, would be most relevant for net and trap fishery participants homeported in fishing communities of:

- Channel Islands Harbor (Oxnard),
- Ventura Harbor (~10 nm away from area of proposed change), and/or
- Santa Barbara (~25 nm area of proposed change).

Further input directly from those communities would be needed to clarify potential impacts.

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

Yes. The proposed action 2023-18MPA_6 (Reduce the size of the brown pelican Anacapa Island Special Closure to allow boat access to Frenchy's Cove) would be moot if the closure was abolished as per proposed action 2023-18MPA_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"). There are also potential contraindications between both of these proposed actions and options stated in petition 2023-27MPA (amend existing Anacapa SMCA, evaluating three options (solutions) and choose the one that best protects the eelgrass meadow while allowing for community access), and 2023-34 (allow commercial take of sea urchins in nine State Marine Conservation Areas, including Anacapa Island SMCA) which could also affect the Anacapa Island Special Closure.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

Table 1. MPA attributes (area, LOP, depth range, and habitat extent) of the existing Vandenberg SMR, as well as the nearshore and offshore MPAs proposed in 2023-18MPA_1 (A) and 2022-04 (B). A dash (—) indicates that the MPA does not contain the habitat type. Habitat extent may be reported in linear miles or square miles, depending on data availability and Science Advisory Team (SAT) guidance.

Values shown in **bold** indicate that the MPA attribute meets the relevant science guideline established by the SAT during the MLPA Initiative planning process. An MPA contributes to habitat replication only if it first meets the minimum size (>9 sq mi) and LOP (Very High, High, or Moderate-High) criteria (i.e., first two rows must be bold).

	Existing	Offshore SMR (A)	Nearshore SMCA (A)	Offshore SMR (B)	Nearshore SMCA (B)
MPA Area (sq mi)	**32.91**	**31.83**	1.08	**32.88**	0.03
Level of Protection	**Very High**	**Very High**	Moderate-Low	**Very High**	Moderate-Low
Min Depth (m)	0	0	0	0	0
Max Depth (m)	42.0	42.0	8.2	42.0	5.3
Eelgrass (sq mi)	—	—	—	—	—
Kelp (mi)	**1.28**	1.28[a]	—	**1.28**	—
Beach (mi)	**13.19**	—	**13.19**	**12.73**	0.42
Rocky Intertidal (mi)	**9.99**	—	**9.99**	**9.99**	—
Estuaries (sq mi)	1e-3	—	1e-3	1e-3	—
Hard Substrate					
0-30 m (mi)	**2.18**	2.18[a]	—	**2.18**	—
30-100 m (sq mi)	0.04	0.04	—	0.04	—
100-200 m (sq mi)	—	—	—	—	—
>200 m (sq mi)	—	—	—	—	—
Soft Substrate					
0-30 m (mi)	**12.04**	12.04[a]	—	**12.04**	—
30-100 m (sq mi)	**8.85**	**8.85**	—	**8.85**	—
100-200 m (sq mi)	—	—	—	—	—
>200 m (sq mi)	—	—	—	—	—

[a] Would not count towards habitat replication despite meeting the minimum size because the MPA does not encompass the full 0-30 m depth range

CITATIONS

Adams, P.B., Boydstun, L.B., Gallagher, S.P., Lacy, M.K., McDonald, T., K.E. Shaffer. 2011. California Coastal Salmonid Population Monitoring: Strategy, Design, and Methods. State of California Natural Resources Agency Department of Fish and Game Fish Bulletin 180.

Boughton, D., Nelson, J., M.K. Lacy. 2022. Integration of Steelhead Viability Monitoring, Recovery Plans and Fisheries Management in the Southern Coastal Area. State of California Natural Resources Agency Department of Fish and Game Fish Bulletin 182.

Busby, P.J., T. C. Wainwright, G. J. Bryant, L. J. Lierheimer, R. S. Waples, F. W. Waknitz, I. V. Lagomarsino. 1996. Status review of west coast steelhead from Washington, Idaho, Oregon, and California. NOAA Technical Memorandum NMFS-NWFSC-27, U.S. Department of Commerce.

California Department of Fish and Game (CDFG). 2001. California's Living Marine Resources: A Status Report. W. S. Leet, C. M. Dewees, R. Klingbeil, E. J. Larson, eds. (University of California Press, Berkeley, CA).

California Department of Fish and Game (CDFG). 2002a. Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary, vol. I.

California Department of Fish and Game (CDFG). 2002b. Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary, vol. II.

California Department of Fish and Wildlife (CDFW). 2015. Regarding proposed amendments to Section 632, Title 14, California Code of Regulations, Marine Protected Areas, Marine Managed Areas, and Special Closures. Memorandum to S. Mastrup, Executive Director, Fish and Game Commission, June 15, 2015.

California Department of Fish and Wildlife (CDFW). 2022. California's Marine Protected Area Network Decadal Management Review.

California Department of Fish and Wildlife (CDFW). 2025. Memorandum to Marine Protected Area Outreach Partners. Guidance to inform color updates to No-Take State Marine Conservation Areas in Marine Protected Area Outreach and Education Materials, July 31, 2025.

California Fish and Game Commission (CFGC). 2002a. Final Statement of Reasons for Regulatory Action: Amend Section 630 and Adopt Section 362, Title 14, California Code of Regulations—Marine Protected Areas.

California Fish and Game Commission (CFGC). 2002b. Initial Statement of Reasons for Regulatory Action; South Coast MPAs. Adopted Aug. 2, 2002.

Cameron, N. M., R. A. Scrosati, N. Valdivia, Z. D. Meunier. 2024. Global taxonomic and functional patterns in invertebrate assemblages from rocky-intertidal mussel beds. Sci. Rep. 14, 1–12. https://doi.org/10.1038/s41598-023-50549-8

Carretta, J. V., K. A. Forney, E. M. Oleson, D. W. Weller, A. R. Lang, J. Baker, M. M. Muto, et al. 2019. U.S. Pacific Marine Mammal Stock Assessments: 2018. NOAA Tech. Memo. NOAA-TM-NMFS-SWFSC-617. https://repository.library.noaa.gov/view/noaa/20266.

Marine Life Protection Act Initiative (MLPA). 2006a. California Fish and Game Commission Preferred Alternative for Implementation of the Marine Life Protection Act in the Central California Coast Region (Pigeon Point to Point Conception) August 15, 2006.

Marine Life Protection Act Initiative (MLPA). 2006b. Central Coast Project Side-by-Side Comparison of Proposed MPA Packages 1, 2R, and 3R (maps and proposed regulations).

Marine Life Protection Act Initiative (MLPA). 2009a. South Coast planning process Intent: California Marine Life Protection Act Initiative MLPA Blue Ribbon Task Force Motion for an Integrated Preferred Alternative as Adopted as November 10, 2009.

Marine Life Protection Act Initiative (MLPA). 2009b. California Marine Life Protection Act Initiative Draft Methods Used to Evaluate Marine Protected Area Proposals in the MLPA South Coast Region. October 26, 2009 Draft.

Marine Life Protection Act Initiative (MLPA). 2010. Letter from MLPA Master Plan Science Advisory Team co-chairs to the Executive Director of the California MLPA Initiative. Responses to concerns expressed in an August 24, 2010 letter from the Office of the Tribal Attorney for the Yurok Tribe, Sept. 27, 2010.

Marine Reserves Working Group (MRWG). 2002. History of the Channel Islands Marine Reserves Working Group Process.

National Marine Fisheries Service (NMFS). 1985. Endangered and Threatened Wildlife; Guadalupe Fur Seal. Fed. Reg. 50, 51252 (16 Dec. 1985).

National Marine Fisheries Service (NMFS). 1990. Listing of Steller Sea Lions as Threatened Under the Endangered Species Act; Final Rule. Fed. Reg. 55, 49203–49241 (26 Nov. 1990).

National Marine Fisheries Service (NMFS). 1997. Endangered and Threatened Species; Final Listing Determinations for Distinct Population Segments of West Coast Steelhead. Fed. Reg. 62, 43937 (18 Aug. 1997).

National Marine Fisheries Service (NMFS). 2019. California Sea Lion (*Zalophus californianus*): U.S. Stock—Marine Mammal Stock Assessment Report. NOAA, revised Mar. 18, 2019.

National Oceanic and Atmospheric Administration (NOAA). 2007. Establishment of marine reserves and a marine conservation area within the Channel Islands National Marine Sanctuary. Fed. Reg. 72, 29208–29244.

Office of National Marine Sanctuaries (ONMS). 2019. Channel Islands National Marine Sanctuary 2016 Condition Report. NOAA, Silver Spring, MD.

Ohashi, K., and D.-P. Wang (2004), Circulation in the Santa Maria Basin, California, during 1998, Journal of Geophysical Research, 109, C11012, https://doi.org/10.1029/2004JC002362.

Patsch, K., D. R. Reineman. 2023. California Coastal Access, Facilities, Amenities, and Parking Dashboard. Accessed Nov. 13, 2023.

Simenstad, C. A., & J.R. Cordell. 2000. Ecological assessment criteria for restoring anadromous salmonid habitat in Pacific Northwest estuaries. Ecological Engineering 15:283–302.

Teagle, H., S. J. Hawkins, P. J. Moore, D. A. Smale. 2017. The role of kelp species as biogenic habitat formers in coastal marine ecosystems. J. Exp. Mar. Biol. Ecol. 492, 81–98. https://doi.org/10.1016/j.jembe.2017.01.017

U.S. Fish and Wildlife Service (USFWS). 1993. Determination of threatened status for the Pacific coast population of the western snowy plover. Fed. Reg. 58, 12864–12874.

U.S. Space Force. n.d.a. U.S. Space Force Integrated Natural Resources Management Plan, Vandenberg Space Force Base.

U.S. Space Force. n.d.b. Vandenberg Space Force Base Flyer: Western Snowy Plover—Sharing the Beach.

White, J.W., M.H. Carr, J.E. Caselle, L. Washburn, C.B. Woodson, S.R. Palumbi, P.M. Carlson, R.R. Warner, B.A. Menge, J.A. Barth, C.A. Blanchette, P.T. Raimondi, and K. Milligan. 2019. Connectivity, dispersal, and recruitment: Connecting benthic communities and the coastal ocean. *Oceanography* 32(3):50–59, https://doi.org/10.5670/oceanog.2019.310.

Wright, S. K., D. D. Roby, and R. G. Anthony. 2007. Responses of California brown pelicans to disturbances at a large Oregon roost. Waterbirds 30:479-487.

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21st April, 2026

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

Subject: **Support for Petition 2023-18MPA – Santa Barbara Channel MPA Refinements**

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 am writing to express our support for Petition 2023-18MPA, which proposes a series of targeted refinements to Marine Protected Areas within the Santa Barbara Channel region.

This petition represents a collaborative, consensus-based effort developed through the Santa Barbara Channel MPA Collaborative, incorporating on-the-ground experience, stakeholder input, and findings from the MLPA Decadal Management Review.

Importantly, the proposed refinements are **administrative, clarifying, and management-focused in nature**, aimed at improving compliance, enforceability, and public understanding of existing MPAs—rather than expanding closures or restricting access to commercial fishing grounds.

From our review, these changes:

- Do **not reduce access to commercial fishing areas**
- Do **not introduce new restrictions on commercial fisheries**
- Do **not result in displacement of fishing effort**
- Do **not increase pressure on open fishing grounds**

Additionally, the petition itself identifies that the proposed adjustments are expected to have **minimal economic impact**, falling within the scope of previously evaluated conditions under CEQA.

Because these refinements do not alter commercial fishing opportunity or create measurable economic or ecological impacts beyond what has already been analyzed, VCCFA believes that **additional socioeconomic or ecological analysis is not necessary** for consideration of this petition.

Instead, these changes represent a practical and thoughtful effort to improve how existing MPAs function—particularly in areas such as regulatory clarity, enforcement effectiveness, and public compliance.

We also recognize and appreciate that this petition includes provisions that improve fairness, usability, and understanding of MPA regulations for all user groups, while maintaining the integrity of the existing MPA network.

For these reasons, VCCFA supports Petition 2023-18MPA and respectfully encourages the Commission to move forward with its consideration.

Thank you for your time and continued efforts in managing California's marine resources.

Respectfully,

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)

Respectfully submitted,

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)

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

Greg Helms
Petitioner - Santa Barbara Channel MPAs - Petition 2023_18
[redacted]
Santa Barbara CA [redacted]

April 22, 2026

President Eric Sklar
California Fish & Game Commission
P.O. Box 944209
Sacramento, CA 94244

[via email: fgc@fgc.ca.gov]

Dear President Sklar and Commissioners:

Thank you for the opportunity to comment on Petition 2023_18 and for your work in considering the Decadal Management Review for California's historic and important network of marine protected areas. I prepared and submitted Petition 2023_18 to reflect the consensus recommendations of the Santa Barbara Channel Marine Protected Area Collaborative (SBCC). The petition represents the on-the-water experience of local stakeholders interested in effective functioning of MPAs and in enhanced compliance with the local network; I believe it reflects an adaptive approach to MPA management focussed on small but locally important refinements and adjustments based in experience with MPAs in the Santa Barbara and Ventura County coastlines along with the northern Channel Islands.

It may be worth noting that I am a long-time participant in MPA planning and policy advocacy dating back to the Channel Islands Marine Reserve Working Group (MRWG) and have a long history of advocacy in support of MPAs, marine resource protection and conservation. Petition 2023_18 reflects my additional commitment to successful and community-based implementation and management of our adopted MPA network, notwithstanding my continuing support for existing and additional MPA protections and support for tribal and indigenous-led marine conservation initiatives.

I appreciate the California Department of Fish and Wildlife (CDFW) review and recommendations on my petition and offer the following brief comments for your consideration:

1) Vandenberg SMR - Recommend Consistent Enforcement of Existing or Modified Regulations

The Petition recognizes observations by local residents and officials of considerable non-compliance with SMR regulations at this MPA within Department of Defense property (Vandenberg Air/Space Force Base) along the existing Vandenberg SMR, which presents

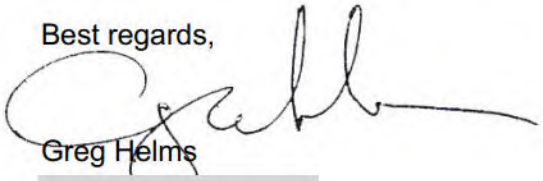
obvious resource conservation concerns. I appreciate CDFW's review of the conservation value of full protection at Vandenberg SMR; were these resource concerns the only matter at issue, I would not hesitate to agree fully. However, living resources take from the SMR by Base personnel – likely prompted by real or perceived inapplicability of the regulations to federal employees – occurs while residents outside Base boundaries face fully-enforced SMR regulations. This inequity poses a fairness concern that is complicating enforcement and undermines community support for the MPA network. Petition 2023_18 urges the Commission to implement one of two corrective actions to address both concerns: enforce SMR regulations equally throughout Vandenberg SMR or, in the case that the State feels it must permit federal military employees and their visitors to take marine resources on-Base, revise Vandenberg SMR regulations to allow shore fishing for finfish with rod-and-reel across the entire SMR by everyone, creating a set of regulations that ***will*** apply to and be enforced uniformly. While the former is preferable, I believe the latter would also result in increased conservation over the status quo. On behalf of the numerous individuals and entities our Collaborative has heard from on this matter, I urge you to investigate and resolve this equity and conservation issue one way or the other.

2) Anacapa Island Special Closure - Vessel Access to Frenchy's Cove

I appreciate CDFW's recognition of the inadvertent effect of Anacapa SMCA/SMR of limiting historic landing access at Frenchy's Cove where educational and recreational outfitters have historically enjoyed access to a small part of this unique remote coastline. The offer to facilitate this access via special permit would largely address the concern; however, local users indicate that the clarity and flexibility provided by a boundary alteration would be preferable.

In conclusion, thank you for your Commission's commitment to managing and reviewing California's outstanding MPA network. Our MPA network is the product of intensive, cross-interest negotiation in which each boundary, regulation and feature resulted from extensive public and stakeholder debate. Our MPA Collaboratives strive to maintain this collaborative spirit and provide the Commission with valuable insights and recommendations from the local level where intent and effect are most directly experienced. I look forward to your continued support for marine protected areas.

Best regards,



Greg Helms

Amended Petition

environmental
DEFENSE CENTER

January 17, 2025

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

Re: Anacapa Island State Marine Conservation Area (2023-27MPA) Revised Petition Cover Message

Dear President Murray and honorable commissioners:

In November 2023, the Environmental Defense Center ("EDC") submitted a petition (2023-27MPA) to reclassify the Anacapa Island State Marine Conservation Area ("Anacapa SMCA") as a State Marine Reserve ("SMR") or, at a minimum, to reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat. We now request that the Fish and Game Commission ("FGC") and California Department of Fish and Game ("CDFW") evaluate the below solutions and choose the one that best protects the eelgrass meadow while allowing for community access:

- Change current regulations to disallow commercial lobster fishing year round
- Change current regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows
- Change the existing border, prohibiting the deployment of lobster traps from 0-30 meters (0-98.43 feet) instead of the existing 0-20 feet

We came to the above alternative solutions after extensive and ongoing community outreach (please refer to EDC's July 31, 2024, letter re: Petition for Anacapa State Marine Conservation Area – Agenda Item 6(c) for more detailed explanation (see attached). The goal of our petition is to protect the historic eelgrass meadow that has gone through rehabilitation and replantation efforts and is being directly threatened by hard bottomed lobster traps, with potential impact from other hard bottomed items like anchors.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager

906 Garden St. Santa Barbara, CA 93101
PHONE (805) 963-1622
www.EnvironmentalDefenseCenter.org

Tracking Number: (_2023-27MPA_)

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: Azsha Hudson
Address: [redacted]
Telephone number: [redacted]
Email address: [redacted]

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested: 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) - Summarize the proposed changes to regulations: ~~This petition seeks to reclassify the Anacapa State Marine Conservation Area (SMCA) as a State Marine Reserve (SMR) or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.~~

This petition seeks to protect the eelgrass meadows located in the Anacapa Island State Marine Conservation Area (SMCA) from hard bottomed objects such as the gear type listed for the commercial lobster fishery and anchors used for vessels. We ask the Commission to evaluate the below solutions and choose the one that best protects the eelgrass meadow while allowing for community access:

- Change current regulations to disallow commercial lobster fishing year round
- Change current regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows
- Change the existing border, prohibiting the deployment of lobster traps from 0-30 meters (0-98.43 feet) instead of the existing 0-20 feet

4. Rationale (Required) - Describe the problem and the reason for the proposed change:

Numerous state and federal policies underscore the importance of eelgrass as an important yet vulnerable species that provides nursery habitat for fish, reduces coastal erosion, acts as a carbon sink, and increases species diversity by providing three-dimensional structure on sandy bottomed habitats.

Based on a scientific study conducted at the Anacapa SMCA from 2016 to 2019[1], and a growing body of literature on eelgrass recruitment and ecology, there is compelling evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

~~The limited subset of pelagic fishing methods allowed at the Anacapa SMCA also creates challenges for enforcement by requiring officers to board vessels and confirm compliance on an individual basis.~~ This petition requests Fish and Game Commission (FGC) approval to support the goals of the Marine Life Protection Act (MLPA), align with state and federal policies focused on eelgrass resilience and health, and protect important eelgrass and associated marine life at Anacapa Island.

SECTION II: Optional Information

5. Date of Petition: ~~11/17/2023~~ 1/17/2025

6. Category of Proposed Change
☐ Sport Fishing
☐ Commercial Fishing
☐ ~~Hunting~~
X 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*)
X 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 X 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: November 1, ~~2024~~ 2025

[1]Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

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

- Petition narrative on eelgrass at Anacapa SMCA
- White paper research from Jessica Alstatt.

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:

This petition protects habitat that confers biodiversity and biomass benefits that enhance the health of Anacapa Island and surrounding ecosystems. Eelgrass beds filter nutrients, stabilize sediments, and increase complexity of the substrate and effective habitat for marine life. As demonstrated by numerous reports of lobster traps "fishing the line" of the Anacapa SMR, fishers perceive that the nearby fully protected MPA has created a beneficial habitat for lobster trapping. Notably, a recent study on the California spiny lobster fishery determined that the short-term losses from a restrictive MPA is compensated by an over 200% increase in total catch after about 6 years of MPA designation.[2]

This petition is intended to protect ~~would close~~ the Anacapa SMCA eelgrass meadow and associated biodiversity from ~~to~~ lobster trapping which occurs during the months of November and December. The proposed amendment would extend the prohibition to include these months. ~~and would also prevent anchoring damage from pelagic fishing efforts.~~ The three potential options we offer to the Commission ~~While converting this SMCA into an SMR~~ may have short term impacts on recreational and commercial fishing, any such impacts will be offset by the long-term ecosystem wide benefits of protecting eelgrass function at this valuable site.

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: Click here to enter text.

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:

[2] Lenihan, H.S., Gallagher, J.P., Peters, J.R. et al. Evidence that spillover from Marine Protected Areas benefits the spiny lobster (Panulirus interruptus) fishery in southern California. Sci Rep 11, 2663 (2021). https://doi.org/10.1038/s41598-021-82371-5

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

Original Petition

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: (2023-27MPA)

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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: Azsha Hudson
Address: 906 Garden Street, Santa Barbara, CA 93101
Telephone number: 805.963.1622
Email address: ahudson@environmentaldefensecenter.org

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) - Summarize the proposed changes to regulations: This petition seeks to reclassify the Anacapa State Marine Conservation Area (SMCA) as a State Marine Reserve (SMR) or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.

4. Rationale (Required) - Describe the problem and the reason for the proposed change:

Numerous state and federal policies underscore the importance of eelgrass as an important yet vulnerable species that provides nursery habitat for fish, reduces coastal erosion, acts as a carbon sink, and increases species diversity by providing three-dimensional structure on sandy bottomed habitats.

Based on a scientific study conducted at the Anacapa SMCA from 2016 to 2019, and a growing body of literature on eelgrass recruitment and ecology, there is compelling evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

- At Anacapa Island the main threat to eelgrass, as found by the study conducted by Jessica Altstatt, are hard bottomed objects.

- Dive surveys found the transplanted eelgrass meadows at Frenchy's Cove within Anacapa SMCA to be damaged and greatly reduced. Concurrent interviews with mariners and National Park rangers revealed that Frenchy's Cove was being fished heavily by spiny lobster fishermen during the two months (November and December) that the brown pelican Special Closure was open.
- Boaters that come to the Channel Islands prefer areas that overlap with eelgrass habitat, leaving the eelgrass susceptible to damage from anchoring.

The limited subset of pelagic fishing methods allowed at the Anacapa SMCA also creates challenges for enforcement by requiring officers to board vessels and confirm compliance on an individual basis. This petition requests Fish and Game Commission (FGC) approval to support the goals of the Marine Life Protection Act (MLPA), align with state and federal policies focused on eelgrass resilience and health, and protect important eelgrass and associated marine life at Anacapa Island.

SECTION II: Optional Information

5. Date of Petition: 11/30/2023

6. Category of Proposed Change

☐ Sport Fishing
☐ Commercial Fishing
☐ Hunting
X 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*)

X Amend Title 14 Section(s): Westlaw regulations.
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☐ 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 X 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:
November 1, 2024

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

- Petition narrative on eelgrass at Anacapa SMCA: Anacapa-MPA-Petition-Narrative_FINAL_2023_11_30
- White paper research from Jessica Alstatt: Altstatt_Eelgrass report_2021_03_01
- Sign on letter for support: Frenchys-Cove-Sign-On_FINAL_2023_11_29

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:

This petition protects habitat that confers biodiversity and biomass benefits that enhance the health of Anacapa Island and surrounding ecosystems. Eelgrass beds filter nutrients, stabilize sediments, and increase complexity of the substrate and effective habitat for marine life. As demonstrated by numerous reports of lobster traps "fishing the line" of the Anacapa SMR, fishers perceive the nearby fully protected MPA has created a beneficial habitat for lobster trapping. Notably, a recent study on the California spiny lobster fishery determined that the short-term losses from a restrictive MPA is compensated by an over 200% increase in total catch after about 6 years of MPA designation.

This petition would close the Anacapa SMCA to lobster trapping year round and would also prevent anchoring damage from pelagic fishing efforts. While converting this SMCA into an SMR may have short term impacts on recreational and commercial fishing, any such impacts will be offset by the long-term ecosystem wide benefits of protecting eelgrass function at this valuable site.

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
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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

Petition Narrative

Overview

This petition seeks to reclassify the Anacapa State Marine Conservation Area (SMCA) as a State Marine Reserve (SMR) or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat. Numerous state and federal policies underscore the importance of eelgrass as an important yet vulnerable species that provides nursery habitat for fish, reduces coastal erosion, acts as a carbon sink, and increases species diversity by providing three-dimensional structure on sandy bottomed habitats.

Based on a scientific study conducted at the Anacapa SMCA from 2016 to 2019[1], and a growing body of literature on eelgrass recruitment and ecology, there is compelling evidence that seasonally occurring lobster trapping and anchoring in the SMCA is destroying eelgrass beds that are otherwise thriving in the adjacent Anacapa SMR.

The limited subset of pelagic fishing methods allowed at the Anacapa SMCA also creates challenges for enforcement by requiring officers to board vessels and confirm compliance on an individual basis. This petition requests Fish and Game Commission (FGC) approval to support the goals of the Marine Life Protection Act (MLPA), align with state and federal policies focused on eelgrass resilience and health, and protect important eelgrass and associated marine life at Anacapa Island.

Importance of Eelgrass Habitat

Eelgrass, specifically *Zostera marina*, is a marine plant that provides significant ecosystem services in shallow, sandy-bottom habitats. Eelgrass beds support complex food webs, filter nutrients, and improve water quality, stabilize sediments, and serve as important refuge and nurseries for marine vertebrates and invertebrates.[2] Eelgrass beds are typically found from shallow waters down to depths of up to 30 meters (98 feet).[3]

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. The National Oceanic and Atmospheric Administration (NOAA) has released several policies related to eelgrass, including the 2014 "California Eelgrass Mitigation Policy and Implementing Guidelines" that emphasize the importance of recovering and sustaining eelgrass across California.[4] Eelgrass is designated as Essential Fish Habitat for various federally managed fish species within the Pacific Coast Groundfish and Pacific Coast Salmon Fisheries Management

[1]Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

[2]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).

[3] marinespecies.wildlife.ca.gov/eelgrass/

[4]https://www.fisheries.noaa.gov/resource/document/california-eelgrass-mitigation-policy-and-implementing-guidelines

Plans and is a habitat area of particular concern for various species within the Pacific Coast Groundfish Fishery Management Plan.[5]

California state policy also recognizes the critical importance of eelgrass; see California Senate Bill 1363 (2016), the Ocean Protection Council (OPC) Strategic Plan (2020-2025) and OPC Ocean Acidification Management Tool (Nielsen et al. 2018), and California Coastal Act sections 30230, 30231. Specifically, the OPC Strategic Plan lists eelgrass preservation and recovery as a priority in its Strategic Plan Target 3.1.4 and aims to protect 15,000 acres of California's eelgrass and create 1,000 new acres by 2025.[6] OPC's Ocean Acidification Action Plan also prioritizes protection and conservation of eelgrass due to its associated carbon storage benefits in sections 4.1.2 and 4.1.3.[7] Globally, eelgrass populations have declined during the past 25 years through a combination of natural and anthropogenic deterioration.[8,9]

While eelgrass restoration efforts have been conducted in the West Coast for over 60 years at significant effort and cost, restoration projects have had mixed success, demonstrating the importance of both protecting existing eelgrass habitat and prioritizing restoration projects that result in successful eelgrass reintroduction.[10]

Ecological Benefits

There have also been a suite of studies demonstrating both the ecological benefits of eelgrass habitat and of fully protected areas, which include higher abundance of commercially important species and that fully protected areas can better support climate adaptation and resilience than lightly protected areas.[11,12] The Channel Islands are home to some of the greatest biodiversity in California and are a critical habitat for a wide range of commercially, recreationally, and culturally important species. Because healthy eelgrass habitat is both ecologically valuable and limited, protecting areas where it can thrive should be a high priority for the State.

Anacapa Island Eelgrass: Need for Improved Protection

Eelgrass used to be abundant at multiple sites at Anacapa island until white urchin (*Lytechinus anemesus)* populations increased and locally extirpated eelgrass following the 1983 El Nino.[13]

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[5]https://www.fisheries.noaa.gov/feature-story/importance-eelgrass

[6]https://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20200226/OPC-2020-2025-Strategic-Plan-FINAL-20200228.pdf

[7] https://www.opc.ca.gov/webmaster/_media_library/2018/10/California-OA-Action-Plan-Final.pdf

[8] Short, F.T. and S. Wyllie-Echeverria. 1996. Natural and human-induced disturbance of seagrasses. Environmental Conservation 23:17–27.

[9] Hemminga, M.A. and C.M Duarte. 2000. Seagrass Ecology. Cambridge University Press, Cambridge, UK, 298 pp.

[10] Melissa Ward and Kathryn Behestri. Lessons learned from over thirty years of eelgrass restoration on the US West Coast. Ecosphere,Volume14, Issue 8, August 2023.

[11] Front Ecol Environ 2018; 16(7): 381–387, doi:10.1002/fee.1934

[12] 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.

[13] Jessica Altstatt, Richard Ambrose, Jay Carroll, James Coyer, Joseph Wible, John Engle "Eelgrass Meadows Return to Frenchy's Cove, Anacapa Island: Recovery Ten Years after Successful Transplantation," Monographs of the Western North American Naturalist, 7(1), 500-517, (1 January 2014)

Frenchy's Cove, which is located within the Anacapa SMCA, historically sustained the largest eelgrass meadow around all Anacapa Island. Researchers at Anacapa Island found that there had been no sign of recruitment at Frenchy's Cove since 1991 up until the 2000s when efforts were made to reintroduce eelgrass into the area.[14,15] Transplanting efforts in 2002 restored eelgrass at several sites at Anacapa Island.

In dive surveys conducted by Jessica Altstatt and her team from 2016 to 2019 at transplantation sites at Anacapa Island and other Channel Islands, Anacapa eelgrass sites had 13-14 species of fish recorded, except for Frenchy's Cove (which had no remaining eelgrass), which only reported six species.[16] Similarly, the lowest densities of kelp bass were largely found at the sites with little to no eelgrass; and the lowest number of observed fish species was at the Frenchy's Cove restoration site, over barren sand.[17] These findings underscore that healthy eelgrass beds have been shown to support increased fish biodiversity and enhance marine life and function at sites around Anacapa Island, and the lack of eelgrass is correlated with diminished marine biodiversity and richness.

The eelgrass species at Anacapa Island, *Zostera marina*, is especially vulnerable to disturbance as it grows in soft sediments and can be easily uprooted by activities like trap fishing, which drag along the sandy bottom and disturb vulnerable habitat. Eelgrass beds at Anacapa Island are typically 20-45 feet in depth, and they expand through fragmentation of the stems and through seed dispersal at short distances, meaning that localized protections are important for eelgrass reproduction.[18]

Dive surveys conducted in 2016 and 2019 found the transplanted eelgrass meadows at Frenchy's Cove within Anacapa SMCA to be damaged and greatly reduced.[19] Concurrent interviews with mariners and National Park rangers revealed that Frenchy's Cove was being fished heavily during the two months (November and December) that the brown pelican Special Closure was open.[20] In November 2019, Channel Islands National Marine Sanctuary staff reported at least 100 lobster traps within the Anacapa SMCA, some as shallow as 17 feet, with another 100 traps along the Anacapa SMR boundary line.[21] Fishing block data for the mainland showed that effort

[14] Ruckelshaus, M.H. 1996. Estimation of genetic neighborhood parameters from pollen and seed dispersal in the marine angiosperm Zostera marina L. Evolution 50:856–864.
[15] Reusch, T.B.H., W.T. Stam and J.L. Olsen. 2000. A microsatellite-based estimation of clonal diversity and population subdivision in Zostera marina, a marine flowering plant. Molecular Ecology 9:127–40.
[16]Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities
[17]*Id.*
[18] Olesen, B., Krause-Jensen, D. & Christensen, P.B. Depth-Related Changes in Reproductive Strategy of a Cold-Temperate Zostera marina Meadow. Estuaries and Coasts 40, 553–563 (2017). https://doi.org/10.1007/s12237-016-0155-4
[19]Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities
[20]*Id.*
[21]*Id.*

more than doubled within blocks containing fishing areas adjacent to SMRs.[22] Notably, eelgrass continued to thrive within the Anacapa SMR itself, 200 meters to the east of the SMCA.[23]

In the summer and fall of 2016, the research team also marked and reported four abandoned lobster traps within Frenchy's Cove, with one along the boundary with the Anacapa SMR. The other three traps were within a mapped footprint of the eelgrass restoration site within the SMCA, where there was no longer any eelgrass remaining.[24] In a 2019 survey, an abandoned trap was found "ghost fishing" and was filled with live lobsters along the Anacapa SMR boundary.[25]

The impact of lobster trapping and boat anchoring (from lobster trapping, as well as other fishing and recreational sources) within Anacapa SMCA has been to denude transplanted eelgrass beds and prevent ongoing recruitment and growth of this important species and habitat.[26] Disturbing and harming the sandy bottom has a conclusively negative impact on eelgrass survival. Converting this area to an SMR is necessary to protect future eelgrass recovery efforts and all the associated benefits to fish and marine ecosystems.

Notably, the Altstatt paper from 2021 contained the following specific policy recommendation:

> Re-classify the shallow soft-sediment bottom within the Frenchy's SMCA as SMR or No Entry (it is already a Special Closure 10 months out of the year). Suitable habitat for eelgrass within Frenchy's Cove only exists within certain hydrodynamic and depth parameters (20'-45'), and over soft bottom not rock. This area historically sustained the largest eelgrass meadow at all of Anacapa Island. Our restoration work showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (trapping) were to cease.[27]

Impact of Hard Bottom Objects on Shallow Root Eelgrass (*Zostera marina)*

Eelgrass faces many threats in Southern California, including increased turbidity, dredging, construction, and pollution.[28] At Anacapa Island the main threat to eelgrass, as found by the study conducted by Jessica Altstatt, are hard bottomed objects.[29] Lobster traps are not the only

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[22] Lenihan, H. S., Gallagher, J. P., Peters, J. R., Stier, A. C., Hofmeister, J. K., & Reed, D. C. (2021). Evidence that spillover from Marine Protected Areas benefits the spiny lobster (Panulirus interruptus) fishery in southern California. *Scientific Reports*, *11*(1), 2663.

[23] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

[24] *Id.*

[25] *Id.*

[26] *Id.*

[27] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

[28] Merkel, K.W. 1991. The use of seagrasses in the enhancement, creation, and restoration of marine habitats along the California Coast: Lessons learned from fifteen years of transplants. Technical Advisory Panel presentation to Marine Board, National Research Council Committee on the role of technology in marine habitat protection and enhancement. 20 March 1991. San Francisco, CA.

[29] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

object that can reduce transplantation success. A study conducted in Puget Sound on seagrass that has a similar makeup to the eelgrass present in the waters surrounding Anacapa Island looked at the impact of Dungeness crab traps set in an eelgrass bed. It was determined that traps could lead to the destruction of the eelgrass immediately beneath it and create a scour hole that would also be devoid of eelgrass.[30] Recovery of the eelgrass after a few months saw less than 50% recovery, but no further growth was found after eight months.[31]

Anchors are also detrimental to survival and expansion of eelgrass. Boaters that come to the Channel Islands prefer areas that overlap with eelgrass habitat, leaving the eelgrass susceptible to damage from anchoring.[32] In areas that attract boaters there is a cumulative impact from the setting and dragging of the many anchors used over time.[33] Hard bottomed objects resting on top of eelgrass for extended periods cause blades to become broken or abraded, which may disrupt normal blade function.[34] Other impacts to the eelgrass include blades of grass being crushed into the underlying anoxic sediments, likely suffocating the plants and leading to eventual deterioration of above-ground plant, and shading by traps that reduces light availability, thereby inhibiting photosynthetic function.[35]

Increasing Enforcement Efficacy

This petition requests that the Anacapa SMCA be converted to an SMR, removing commercial and recreational lobster fishing and pelagic fishing from the allowable activities. Current regulations for the Anacapa SMCA state the following:

> It is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource, EXCEPT:
>
> Recreational take of lobster and pelagic finfish (northern anchovy, barracudas, billfishes, dorado (dolphinfish), Pacific herring, jack mackerel, Pacific mackerel, salmon, Pacific sardine, blue shark, salmon shark, shortfin mako shark, thresher shark, swordfish, tunas, Pacific bonito, and yellowtail) is allowed.[36]

Converting Anacapa SMCA into an SMR will support law enforcement effectiveness as officers will be able to assess compliance from a distance and not required to individually contact, board, and verify each fishing vessel to determine the species and gear being deployed. It is notable that the ocean salmon fishery has closed as of 2023 due to poor fish survival, so removing this species from allowable activities would have no impact on the industry in the near term.

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[30] June J. , Antonelis K. 2009. Marine Habitat Recovery of Five Derelict Gear Removal Sites in Puget Sound. Natural Resources Consultants, Inc, Seattle, WA. Report for the Northwest Straits Initiative. 19 pp.
[31] *Id*.
[32] https://www.nps.gov/chis/learn/nature/seagrass-beds.htm
[33] Santa Barbara Channel Keeper (2009-2010). The Role of Eelgrass Beds as Fish and Invertebrate Habitat. https://www.sbck.org/wp-content/uploads/2013/06/Eelgrass-Report.pdf
[34] Uhrin, A. V., Fonseca, M. S., and DiDomenico, G. P. 2005. Effects of spiny lobster on seagrass beds: damage assessment and evaluation of recovery. American Fisheries Society Symposium, 41: 579–588.
[35] *Id*.
[36] https://wildlife.ca.gov/Conservation/Marine/MPAs/Anacapa-Island.

Socioeconomic Impacts

This petition protects habitat that confers biodiversity and biomass benefits that enhance the health of Anacapa Island and surrounding ecosystems. Eelgrass beds filter nutrients, stabilize sediments, and increase complexity of the substrate and effective habitat for marine life. As demonstrated by numerous reports of lobster traps "fishing the line" of the Anacapa SMR, fishers perceive the nearby fully protected MPA has created a beneficial habitat for lobster trapping. Notably, a recent study on the California spiny lobster fishery determined that the short-term losses from a restrictive MPA is compensated by an over 200% increase in total catch after about 6 years of MPA designation.[37]

This petition would close the Anacapa SMCA to lobster trapping during the months of November and December and would also prevent anchoring damage from pelagic fishing efforts. While converting this SMCA into an SMR may have short term impacts on recreational and commercial fishing, any such impacts will be offset by the long-term ecosystem wide benefits of protecting eelgrass function at this valuable site.

Advancing Goals of the MLPA

This petition advances MLPA goals 1, 2, 3, and 5.

- Goal 1: Converting the Anacapa SMCA to an SMR will directly "protect the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems" by removing a significant and specific threat to eelgrass – recreational and commercial lobster fishing. In its absence, the 2019 study authors explicitly state: "Our restoration work showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (trapping) were to cease."

- Goal 2: This petition also "sustains, conserves, and protects marine life populations" of both eelgrass and a wide range of marine species that rely on and benefit from eelgrass, as shown by studies indicating higher biodiversity in areas with eelgrass versus the bare sandy bottom that results from lobster trapping and damage from boat anchors. Global research has also shown that fully protected MPAs confer biodiversity and biomass benefits, which further supports the request of this petition.

- Goal 3: Anacapa's transplanted eelgrass beds are a critical "study opportunity" for understanding how to restore eelgrass in other parts of California and temperate climates. Anacapa Island is an important natural laboratory that has been used by researchers to inform broader eelgrass management efforts since the 1980s. Increasing eelgrass research and recovery is a priority for agencies including OPC and NOAA. The proposed conversion to an SMR can support that important work by helping restore eelgrass beds where they are currently harmed by fishing pressures.

[37] Lenihan, H.S., Gallagher, J.P., Peters, J.R. et al. Evidence that spillover from Marine Protected Areas benefits the spiny lobster (Panulirus interruptus) fishery in southern California. Sci Rep 11, 2663 (2021). https://doi.org/10.1038/s41598-021-82371-5

- Goal 5: As the state considers adaptive management of the MPA network, it is important to make decisions that support "effective management measures and adequate enforcement and are based on sound scientific guidelines." The current allowable activities at the SMCA include take of select pelagic fish, which creates complexity for enforcement officers who must ensure individual compliance with regulations. Commercial and recreational lobster fishing is also allowed; but as described above, recent surveys and studies demonstrate that there is a clear and specific fishing-related threat to eelgrass beds at the Anacapa SMCA, and that converting to an SMR will remove that pressure and allow for ecosystem recovery. Prohibiting these fishing pressures will support enhanced enforcement and align with recently available scientific findings about the significant damage caused by lobster traps and boat anchoring.

Alignment with Decadal Management Review

This petition supports the Decadal Management Review (DMR) recommendation #4: "Apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network and Management Program." Over the past decade, significant research has been conducted in the Anacapa SMCA and surrounding ecosystems to better understand how policy protections can support eelgrass ecosystem recovery and safeguard this critical species. The DMR report and recommendations also underscore that enhancing MPA enforcement is a continued priority, so creating regulations that facilitate compliance and simplify allowable activities is a clear pathway for addressing this ongoing management goal.

Available data demonstrates that lobster traps and boat anchors in Anacapa SMCA cause significant harm to eelgrass recovery efforts. Eelgrass beds in the nearby Anacapa SMR were healthy, while those in the SMCA were degraded or nonexistent following lobster season. When combined with the benefit of streamlining enforcement by removing piecemeal fishing allowances, this petition clearly responds to the DMR and confers multiple benefits for MPA management.

By approving the conversion of Anacapa SMCA to an SMR, the FGC will integrate the best available science into MPA policy; support the goals of the MLPA; advance federal and state policies advocating for the recovery and protection of eelgrass; and directly support the DMR's goal of adaptively managing MPAs based on findings from the past decade.

Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition, Health and Extent of Beds and Biological Monitoring of Associated Fish and Invertebrate Communities

March 1, 2021

Jessica Altstatt

Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities

Abstract

Eelgrass (*Zostera pacifica*) meadows were present along the northern shores of Anacapa Island prior to the late 1980s, when sea urchin over-grazing led to local extirpation. No natural recruitment occurred over 12 years and in 2002, ~500 eelgrass (*Zostera pacifica*) shoots from two large meadows at Santa Cruz Island (Smugglers, Prisoners) were transplanted to Frenchy's Cove, Anacapa Island. The short-term survivorship and growth of eelgrass at the transplantation site and continuing expansion of eelgrass from the restoration site to the east along Middle Anacapa Island was documented over a 17 year period, along with conditions at naturally occurring beds at Santa Cruz and Santa Rosa islands. Eelgrass bed dynamics and associated fish and invertebrate communities were characterized in 2016 and 2019 and compared with existing conditions within the donor beds and other Channel Islands eelgrass meadows. At Anacapa, eelgrass meadows have persisted longer post-transplantation (2003-2019) than was documented without natural recovery prior to our efforts (1991-2002), and are fully functioning habitat as shown by fish and invertebrate communities, and when compared to natural meadows at Santa Cruz Island.

Introduction

Seagrasses are flowering plants that have evolved from land plants to live in the ocean, forming lush green underwater meadows. These meadows or beds are an important coastal habitat and support complex food webs, provide refuge for animals, filter out nutrients, and stabilize sediments. Species diversity in seagrass beds can be nearly twice as high as on nearby sandy intertidal and subtidal habitats (Engle et al, unpublished data). Through photosynthesis, seagrass fixes carbon from carbon dioxide dissolved in seawater, and transfers that carbon to the sediments. Growing interest in the potential of seagrass as a ‘green carbon’ solution to climate change is amplified by recent evidence that subtidal seagrass beds could play a critical role in slowing or reversing the deleterious effects of ocean acidification on marine larval invertebrates and fishes. The focus of most seagrass research has been in intertidal estuaries but submerged beds occurring along the open coast may contribute as much or more value. Thus, the need for up-to-date information on the size, health and habitat function of the major seagrass beds around the Channel Islands and Santa Barbara mainland coast is ever-more relevant and timely.

There are two types of seagrasses found along the California coast- surfgrass and eelgrass. Surfgrass (genus *Phyllospadix*) grows in rocky wave-swept environments while eelgrass (genus *Zostera*) grows in soft sediment found in sheltered coasts, bays and estuaries. *Zostera sp*. was historically abundant in California’s shallow inlets but has been especially damaged by coastal development and up to 90% of

its historic range has been lost. DNA analysis has defined two species occurring at the California Channel islands—*Z. marina* and *Z. pacifica* (Coyer *et al*. 2007).

Although both surfgrass and eelgrass are flowering plants and produced seeds, eelgrass is especially vulnerable to disturbance as it grow in soft sediments and can be uprooted. Additionally, eelgrass beds expand through vegetative growth of rhizomes and the chance of long-range dispersal of seeds is very low. Thus, its ability to naturally spread over long distances happens only over a very long time scale. Evidence from genetic studies suggest that the largest eelgrass beds around the Channel Islands are mostly clonal and may be thousands of years old (Coyer *et al.* 2007).

Expeditions of the Channel Islands Research Program (CIRP) in the 1980s and 1990s yielded information on location and size estimates of major eelgrass meadows around the Channel Islands, as well as data on associated fish and invertebrate density (Engle and Miller 2005). These meadows (along with several along the mainland coast) were then re-surveyed in 2007-9 by some of the same research cruise participants.

Up until the mid 1980s, eelgrass had been abundant at multiple Anacapa Island locations from Frenchy's Cove to Cathedral Cove. An unusual recruitment event of the white urchin *Lytechinus anemesus* following the 1983 el Niño led to over-grazing and extirpation of eelgrass from all of Anacapa. In 2002, a trial restoration project was initiated to test whether or not eelgrass recruitment could be 'jump-started' by using vegetative material from nearby Santa Cruz Island. Over ten years, a meadow coalesced, expanded, and spread from within the Anacapa Special Closure and State Marine Conservation Area (SMCA), towards the east into the State Marine Reserve (SMR). The project was deemed a success with eelgrass spreading most of the length of Middle Anacapa Island (Altstatt *et al.* 2014).

Observations and data collected at the restoration site in 2011 and 2012 suggested that something was impacting the soft bottom habitat within Frenchy's Cove. Information gained from mariners and National Park rangers confirmed that the cove was being targeted by trap fishing during the commercial season months of November and December.

MPAs are even more critical for providing resilience and refuge within a changing ocean. Eelgrass habitat, limited by water clarity and exposure, faces very real threats from climate change-related physical disruption from increased wave activity and storm severity. In addition, sea level rise may reduce the resiliency of some beds due to steep shore topography and reflection from waves.

2016-2019 Project Purpose

We assessed eelgrass condition, density and abundance within major beds at Santa Cruz and Santa Rosa Islands, and along the north side of Anacapa Island that include our restoration site and "downstream" areas of restored meadows (seeded from the restored population). We also gathered information on density and abundance of associated invertebrate and fish species. Information gathered was then compared to that from large-scale, multi-island surveys performed in 1994-1997 (Engle,

CIRP) and in 2007- 2009 (Altstatt, CIRP). Additional opportunistic surveys occurred at various sites between this range of dates.

Anacapa and eastern Santa Cruz island sites were visited in 2016 but survey scope was limited. Enough information was gathered, however, to determine that the commercial lobster trap fishery had severely impacted the epicenter of our restored eelgrass bed within the Anacapa State Marine Conservation Area at Frenchy's Cove. Eelgrass occurring within the neighboring marine reserve was flourishing. This unexpected and very interesting result needs focus, as it has implications for soft-bottom (and other) habitats that fall just outside of marine reserves. In light of the recent years of unprecedented warm water, the health of the beds is unknown and potentially facing dramatic change due to disease, increased predation from recruitment of warmer water species, or physical disruption from increased wave activity during el Niño storms.

We envisioned that the 2019 season of surveys could be the first in a much larger multi-year effort, that will collect information needed to conduct stock assessments for threatened species, the ability of specific seagrass meadows to adapt to changes in sea levels and storm damage due to climate change, and could help address the capacity of eelgrass meadows to buffer changing pH levels.

Primarily, this study was conducted to address the following questions:

-how stable over time are shoot density and meadow extent in naturally occurring eelgrass beds?

-how similar in size and density are the meadows at Anacapa to naturally occurring beds at Santa Cruz and Santa Rosa?

-do the restored eelgrass meadows at Anacapa perform at the same habitat level as naturally occurring beds at Santa Cruz?

Additional questions include:

-does eelgrass extent/coverage/patchiness affect determine fish and invert species richness, abundance?

-do eelgrass beds within Marine Reserves and their associated fish and invertebrates differ from those outside?

-are there implications for management of Marine Protected Areas, and what are the recommendations?

Methods

Site Descriptions

We surveyed thirteen island eelgrass meadows between April 24 and July 27 2019. We chose meadows that were known to be temporally stable, and/or that had been sampled repeatedly since the 1990s. One site was at Santa Rosa Island, eight sites at Santa Cruz Island, and four sites at Anacapa Island including the original restoration site within Frenchy's Cove (Figure 1).

We also chose two locations that we suspected may have changed (East Prisoners) or that had been mapped in 2015 (Merkel 2015) that we wanted to ground-truth (East Scorpion). In general, the most protected sites were closest to shore and those sites subject to wave action were deeper and farther offshore. Specific dive locations were chosen with the help of our previous maps and notes to ensure that a full survey could fall within eelgrass meadow rather than sandy plain.

Most sites were visited at least twice; Old Ranch, Eagle Canyon, East Scorpion, and Smugglers, only once.

Divers mapped the western and inner meadow edge at Scorpion, and this data was then provided to the National Park Service (NPS) to assist in their process planning for construction of the new pier. The trackline created by this dive is shown in Figure 2.

Santa Rosa Island

Old Ranch

This expansive eelgrass meadow was not known to CIRP during the 1990s. It is far enough offshore that it escaped detection until we were alerted by a commercial crab fisherman in 2002 who found his traps fouled with eelgrass. Dives occurred in 2002 and 2003 for mapping and general description, but no qualitative surveys were done. We surveyed this bed in August 2008, with additional scouting. Work in Fall 2009 was aborted after one dive as the current was too strong. The 2019 surveys did not reach the outer edge of the mapped eelgrass bed, which we estimated to be another 150-200m to the east, as it was approximately 600m offshore and thus subject to strong currents.

This eelgrass meadow is more than 800 meters long and at least 350m wide. The sediment is white clean sand and meadows occur from 35' to 50' depths. We sampled two sites each ~430m off of the beach.

Santa Cruz Island

Prisoners Harbor

Prisoners Harbor is perhaps the most sheltered location on the island, tucked inside a large bight on the north side of the island. The NPS maintains a pier and mooring can in shallow water (~17'). This is a popular location with pleasure boats, especially northwest of the pier. Holes in the eelgrass bed from anchoring are evident in this area. The western headland protects the nearshore habitat from even strong westerly swells. The area is only rarely affected by strong Santa Ana winds that produce steep wind waves from the NE. These meadows are 135m off the beach and 80m off the western headland. The eelgrass bed to the west of the pier extends roughly N-S for hundreds of meters and in to 11' depth inside of the pier. The sediment in the inner harbor is fine and dark. We sampled two areas (~60m apart) in 2019.

In the surveys of the 1990's, it was thought that a separate bed lay 2 km to the east at Cañada del Agua. During our 2009 mapping study, we swam this stretch of coastline and documented that a solid band of eelgrass extends the entire distance. This bed is fairly defined both on the shallow and deep edge. Moving easterly from the pier, the north side of the island becomes more exposed to prevailing swell and current, and the eelgrass meadows are in deeper water.

East Prisoners

This site is east of the pier off to the first headland. The sediment immediately offshore of the Cañada del Puerto wetlands and creek mouth bears evidence of occasional terrestrial inputs of branches, cobbles and boulders. There has been a narrow canyon carved out from previous heavy flows that is up to 10' deeper than surrounding areas. The creek mouth is closed off from the ocean most of the time but it is evident that when the creek is discharging, eelgrass habitat is affected. In 2001 the eelgrass was described in this area as very patchy (Richards 2001), but was more continuous and uniform when mapped in 2009. It is unknown what the long-term effects of the on-going Cañada del Puerto watershed restoration by NPS will be, although it is possible that the wetlands will prevent the 'flashiness' of previous high water years, and thus could reduce scouring in the nearshore environment.

This area is 110m – 150m offshore.

There are several minor headlands to the east of Prisoners that provide protection from prevailing swell. We sampled three of these areas in 2019. The locations in the eastern lee of these headlands are Eagle Canyon, Cañada del Agua and Aguaje Escondido.

Eagle Canyon

The only time that we dove here in the past was for mapping in 2009. The eelgrass meadow is 90 meters offshore.

Cañada del Agua

In 1997, Cañada del Agua meadows were described as isolated and no grass was detected to the east. In 2001, it was noted that this area was the east end of roughly 1.5 km of eelgrass patches and meadows stretching from the Prisoners pier. In 2003 using the ship's fathometer, the bed was estimated at between 1-10 hectares with 0.5 km or less of shoreline. In 2009, during diver surveys it appeared that eelgrass tapered off past the cove and was not continuous to the east.

The eelgrass meadows are 130 meters off the headland and roughly 100 meters wide, centered at 28' depth.

Aguaje Escondido

This area was not surveyed in the 1990s, as at that time it was limited to several small patches. In 2003, eelgrass habitat at this location was less 2.5 acres and less than 500 meters of shoreline. It did not appear that the area was contiguous with eelgrass to the west.

During the cruises conducted 2008-09, based on these earlier observations, we did not chose to re-survey or map here. The 2015 NMFS sonar surveys found that this bed had expanded and was now a continuous band with eelgrass to the west.

The eelgrass meadows are 110 meters off of the headland and are up to 250 meters wide.

Scorpion

There has been a meadow in this sheltered location as least as far back as 1981 (Engle, personal communication). Grazing by white urchins occurred in the late 1980s and surveys in 1994 found the bed to be 0.1-1 hectare with less than 0.5 km of shoreline. A flash flood in December 1997 caused extreme flooding within Scorpion Canyon, leading to deposition of sediment and debris into the cove, leading to an estimated reduction in eelgrass by 30% or more (Richards, personal communication). In 2001, the eelgrass bed was a series of very dense patches 3-8 meters in diameter. This eelgrass bed is in a heavily used anchorage in font of the National Park island headquarters and popular visitor area. Two mooring balls were placed within Scorpion for use by NPS and concessionaire vessels in the 1990s. Since then, the bed has been a mosaic of meadows with circular open areas resulting from periodic relocation of the NPS mooring anchors and chain, and old anchor scars. Advocacy work in 2007-8 temporarily resulted in NPS suspending the chain off the sea floor by using a sub-surface float. Within a few years, however, the subsurface floats were removed by maintenance staff and the chain once again was on the bottom. This Marine Protected Area will continue to be affected by the chains on the bottom, and routine maintenance of the mooring chain every time the anchors are pulled up and redeployed in a new location, until NPS decides to modify their practices.

This eelgrass meadow is approximately 300 meters long and at least 74 m wide. The bed was mapped as 5.8 acres in 2009.

East Scorpion

This site is 500 meters east of Scorpion and is somewhat less protected. We chose to survey this location as it had been mapped as a solid eelgrass meadow (130 x 100 meters) in 2015 (Merkel 2015). The area is is 130 meters offshore and 100 meters west of Scorpion Rock.

Smugglers Cove

Smugglers Cove, at the east end of Santa Cruz Island, is a wide embayment sheltered from prevailing northwest swell. The bay is exposed to long-period south swells which are common during the summer and fall months. During such events, sediments are suspended near shore and the visibility drops to near zero. Smugglers is both the farthest offshore and the deepest bed at Santa Cruz Island. To the south, there are eelgrass meadows closer to Yellowbanks, but that area is even more susceptible to bad visibility due to the fine sediment and much of this eelgrass is interspersed with low-lying rocky reefs.

Based on previous mapping efforts, the Smugglers eelgrass meadow is more than 1,300 meters long and up to 265 meters wide, and nearly 500 meters offshore. occurring from 38'-50' depths

Anacapa Island

CIRP records of eelgrass at Anacapa in 1979-1981 found extensive eelgrass meadows of 1-10 hectares along the north side of all three islets, and at Cat Rock on the south side of West Anacapa. All the Anacapa beds disappeared in the late 1980's, due to overgrazing by the white urchin, *Lytechinus anemesus* following an extraordinary post- el Niño recruitment event (Engle et al., unpublished data). By 1991 all eelgrass was gone (with the exception of a small patches at Cat Rock and Cathedral Cove, which persisted for a few more years). In April 2003, the entire north side of Anacapa became either a State Marine Reserve or State Marine Conservation Area.

The boundary between the Marine Protected Area (no take, to the east) and the Anacapa Marine Conservation Area (to the west, which allows for take of pelagic fin fish and lobster) runs N-S through Frenchy's Cove. Our two sites straddle this line. There is also a Special Closure to the west of the line for Brown Pelican breeding that closes the area within 1000' of shore to vessel traffic from January through October, but historically it has not been regularly enforced.

Frenchy's Cove, West Anacapa

Historic beds here in the 1980's ranged from 20-45' depths (Engle and Miller 2008). In 1981 this extremely sheltered location area supported the largest bed at Anacapa. By 1991, the eelgrass had been extirpated and CIRP established a permanent transect to monitor yearly for recovery. In 2001 we developed a trial restoration plan for this location with a site within the Seasonal Pelican Closure in the western part of the cove (Altstatt, 2005, Altstatt et al. 2014) with regular monitoring in subsequent years (with the exception of 2013-2015). In 2009 the bed was mapped as 2.9 acres.

Frenchy's Cove is the most protected area at Anacapa Island, offering moderate protection from NW winds and swell. Inshore of about 20' the sand turns to gravel, cobble and shell hash, which limits the inshore distribution of eelgrass. In deeper water, the parchment tube worm *Chaetopterous* has been common to abundant here, building 'reefs' of tubes at or just under the sediment surface. Offshore to the east, there is a rocky outcrop in 60-75' which is at least 100 meters offshore of the eelgrass bed. In cool water years, there is seasonal recruitment of giant kelp and other brown algae onto worm tubes, pebbles and cobble, but this algae rarely persists year-round. The historic eelgrass bed was 100m from shore.

East Frenchy's

This area is just 300 meters to the southeast of the restoration site. Within the first year of restoration planting at Frenchy's, most of the shoots had been dislodged and carried away by water motion. Upon surveying East Frenchys, we found single shoots with new growth, and we realized that these resulted from our work up-current. The eelgrass spread initially from vegetative material that re-rooted, and then from both seed dispersal and vegetative extension of rhizomes. We have monitored growth and spread in to patches here and to the east since 2004.

Current meadows are 90 meters from shore.

Keyhole, Middle Anacapa

This location is ~ 1 km to the east from East Frenchy's. In 1980 eelgrass was dominant here at 25' - 40' depths. We first observed single eelgrass shoots here in 2004. Eelgrass meadows are 85 meters from shore.

East NPS, Middle Anacapa

In 1982, substantial eelgrass meadows were found here from 30-40'. There was no eelgrass here in 2004 or 2005, but by 2011 and 2012 there were scattered patches in 33' to 40' depths. Eelgrass meadows are 150 meters from shore.

Cathedral Cove, East Anacapa (scouting only)

A few small patches of eelgrass persisted here during the urchin over-grazing until 1998. Diver observations through 2012 did not find any remaining eelgrass here. Sonar mapping suggested that sparse eelgrass was present (Merkel 2015).

2019 Survey protocols

The amount of effort at each site varied, but was designed to collect the minimum information needed for site characterization.

A full survey consisted of the following:

- quantitative fish transect 30m x 2m band
- band transect for large invertebrates and algae 30m x 2m band
- 0.25m² quadrats for eelgrass leaf shoot, flowering shoot and seedling density, urchin counts, % cover tubeworms and other sessile invertebrates,
- point-intercept for eelgrass extent and cover along transect line (10cm intervals)

General Dive Plan

All SCUBA activities were approved either by the University of California, Santa Barbara Diving Safety Officer, NOAA scientific diving program, or both. Divers were either NOAA or American Academy of Underwater Scientists (AAUS)-certified and familiar with species identification and survey protocols.

Dive sites were chosen based on our knowledge of preexisting eelgrass bed locations and conditions (Table 1). We planned for one central dive location at the smaller sites and two dive sites at the larger beds (Prisoners, Smugglers, Scorpion, Old Ranch). The anchor was dropped on predetermined GPS coordinates. Transects generally were laid out in cardinal directions (headings of 360, 90, 180 and 270 degrees) starting at the boat's anchor location, resulting in transects that generally ran alongshore, offshore and onshore. A complete survey required two teams of diver buddy-pairs. The first team laid out the tape while doing the fish survey and then conducted band transects and eelgrass extent point intercept survey on way back, leaving the tape in place. The second team scored quadrats and reeled in the tapes. The depth was measured along the transect at each quadrat location.

A typical survey at one dive location would yield four 30m fish transects + up to four extra 30m transects as extensions from the core transects, four 60m² bands, and fifteen 0.25m² quadrats per core transect for 60 quadrats total.

Although the site locations were chosen generally for the probability that they were within the last known extent of eelgrass, once on the bottom we did not abandon or re-route the transects to choose areas of higher density or extent.

Quadrat method

Quadrats were 0.25m² area (0.5m square) and were placed at set locations (every other meter) along the tape, yielding 15 per transect. Counts were conducted within each quadrat for the number of eelgrass turions (shoots), seedlings, and reproductive (flowering) shoots. Divers also searched for urchins and

estimated percent cover of brittlestars and parchment tube worms. Depth was recorded for each quadrat.

Point-intercept method

We performed point-intercept counts every 10cm along each transect in order to estimate how much of the transect fell within an eelgrass patch or meadow. We scored the extent of eelgrass beneath the transect line by assessing the substrate at 10cm intervals along the transect. This yielded a percent of each 30m transect that was either eelgrass bed, bare sand, or other (e.g. worm tubes). These points were tallied and the categories were converted to percentages. For analysis and comparison with previous survey years where detailed point-cover was not consistently recorded for all transects, point-cover was converted to a 1-4 density scale (Orth et al 2021) where 0-10% cover is Very Sparse, 10-40% is Sparse, 40-70% is Moderate, and 70-100% is Dense. This measure gives an idea of the 'patchiness' of the eelgrass at a dive location, and potential compatibility with other seagrass studies.

*Quantitative Fish transect*s

The diver performing the fish survey would slowly swim in the designated direction, extending the meter tape until 30 meters was reached. Any fish observed within the 2m wide transect corridor would be recorded. Fish were scored into four size categories: young of the year (YOY), <15cm, 15-30cm, and >30cm. The diver could pause during the count while recording in order not to miss other fish. Divers usually completed the transect within 3-5 minutes. Most surveys included additional fish transects that extended an additional 30m past the end of each main transect, on the same heading.

Roving Diver Fish Counts

We conducted 30-minute roving diver fish counts (CINP Kelp Forest Monitoring Program 1997) to determine indices of species presence, abundance and diversity. Fish species were scored both on the 5-minute time intervals during which they were encountered, and on abundances recorded during the overall 30-minute survey which were scored into four categories (single [1], few [2-10], common [11-100], and many [>100]). For analysis, we created a weighted abundance index that combined the 'Time Interval Code' and 'Abundance Code' (if a species was not tallied the Abundance Code was zero). The index was the (TIC/10)*AC. This gives more weight to fish seen earlier in the 30-min count, so for example a species with an overall abundance of common (3) seen in the second time interval (9) would have a weighted index of 2.7.

At least one Roving Diver Fish survey was performed at all but two of the dive locations (due to time constraints no Roving Diver Fish surveys were performed at Eagle Canyon or East Scorpion).

Band Transects

The dive team would visually search within 1m bands to each side of the main transect tape and record any major invertebrate or macroalgae encountered, yielding 60m² search area per transect. We did not

sample sediments for infauna other than for obvious bivalves, tube anemones and tube worms extending above the surface. Epifauna was only scored if larger taxa (urchins, sea hares, etc).

In addition to the core methodology, notes, photos and video were taken as time allowed.

2016 Surveys

We did an abbreviated suite of diver surveys at six sites in the summer of 2016 (Table 3). This included quantitative fish transects, invertebrate band transects, and quadrats for eelgrass metrics. In addition we scouted and mapped eelgrass along Middle Anacapa and ground-truthed some reports of eelgrass from a 2015 National Marine Fisheries Service-contracted acoustical mapping effort (Merkel 2015).

2008-2009 Surveys

We collected monitoring data at six islands beds during the 2008-09 field seasons, using methods as described above. During the twelve days of these cruises, between four and seven divers participated each day, collecting the following information: 865 ¼ m^2 quadrats for shoot density and sessile invertebrates, 200 30m quantitative fish transects, and 133 30m band transects for motile invertebrates.

A total 156 individual dives were performed.

1990s Surveys

Three dedicated soft-bottom survey Channel Islands Research Program multi-day cruises to the northern Channel Islands took place in August of 1994, 1995, and 1997. Surveys targeted known or suspected eelgrass beds to determine areal extents, depth ranges, plant density, and community composition, and were repeated at three core sites (Prisoners, Scorpion, Smugglers) in subsequent years to assess annual and multi-year changes. Surveys included detailed eelgrass meadow infaunal and epibiont surveys, and comparisons with non-eelgrass bed sandy habitats. Results were complied in a draft report to the California Coastal Commission in 1998 and major findings were published in Engle and Miller 2005. The density, meadow extent, and fish and major invertebrate transect data are used in the current study to determine meadow function and stability over time.

Statistical Analysis

To account for differences in sampling effort, eelgrass abundance was scaled to the same spatial unit across sites and years. Due to challenges with some transects located almost entirely outside of eelgrass meadows, only quadrats with eelgrass present were included in statistical analysis. To address small sample sizes and non-normal distributions, non-parametric statistics, including median, confidence interval, and interquartile range were included. The Kruskall-Wallace test was used as a nonparametric test between two samples (Conover 1999). All statistics and graphing were conducted in R version

4.0.3 (ref), using packages ggplot2, using packages *ggplot2*, *PerformanceAnalytics*, *tidyverse*, and *Hmisc*.

Results

In general, eelgrass meadows at the largest sites appeared unchanged in location or scale, with the expected suite of species present. Highlights and exceptions are noted in the following sections.

Quadrats Results

A total of 1,095 quadrats were scored during the 2019 study.

Eelgrass Shoot Density

As the dive locations were not adjusted once underwater, some transects ran through patchy or sparse meadows or across bare sand rather than through a dense bed. We excluded those quadrats that fell onto bare sand outside of meadows from analysis of shoot density. The 2019 mean shoot density for 11 sites is shown in Figure 3 (East Scorpion and Frenchy's are excluded as density was ~ 0%). In general, density ranged from 31 to 65 shoots/m².

Sites grouped by similarity in density. Prisoners (65/m²), Eagle Canyon (65/m²) and Scorpion (58/m²) were the highest in density and not significantly different. The three Anacapa SMR sites were not significantly different from each other in density, with a mean of 46/m². Smugglers and Old Ranch (42/m²) were similar, and East Prisoners, Cañada del Agua, and Aguaje Escondido were similar (~33/m²).

Variation in density with depth

At each site, our design ensured that we scored quadrats along 60m of transect that was parallel to shore at a constant depth, and along 60m of transects that crossed the bed from shallow to deep. Depending on the site, the cross-section transects may have captured the inshore edge of the eelgrass, the offshore edge, both, or neither. Two Anacapa beds, East NPS and Keyhole, are shown in Figure 4. The width of the bed at East NPS was ~120m, while at Keyhole the bed was 68m wide. In both cases, eelgrass shoot density tended to increase in shallower water.

Eelgrass patchiness and extent

Mean point-intercept and a four-point density scale for eelgrass are summarized in Figures 5 and 6. Old Ranch, Prisoners, Cañada del Agua, Scorpion, Smugglers, Keyhole and East NPS were categorized as mostly or entirely dense meadows. Eagle Canyon, Aguaje Escondido and East Frenchy's were categorized as moderately dense. East Scorpion and East Prisoners were mostly very sparse. Frenchy's was entirely bare sand but categorized as very sparse (0-10% cover).

Site Conditions

Frenchy's, the original restoration site, had no remaining eelgrass meadows and only a couple of single shoots were observed. Across the cove at East Frenchy's, there were good eelgrass meadows to the east but much of the permanent transect line towards the west and close to the marine reserve boundary was denuded. We did observe meadows off the transect in shallower water.

The greatest increase in meadow extent was found at East NPS, where by 2016 there were extensive uniform (100% cover) meadows in 30-40'. Keyhole was slightly less uniform and similar density. There was no significant difference in shoot density between East NPS, Keyhole and East Frenchy's, although East Frenchy's meadows were the most fragmented. All three Anacapa sites had higher shoot density than Smugglers, which was one of the original donor material locations. Smugglers was extremely uniform in meadow extent (100%) but with moderate density (42 shoots/m^2).

Large bare scars were observed just off the transect corridors at Scorpion, near each of the two mooring anchors, and the mooring cans were no longer held up by sub-surface floats. The NW and inner edge of the bed was similar to previous years. Our tracklines from June 2019 (green) are shown with bed extent mapped by SCUBA in 2009 (purple) and eelgrass delineated by sonar in 2015 (red) in Figure 2. It appears that the bed may have expanded from 2009 to 2015 in all directions, and then contracted by 2019.

The meadows at Aguaje Escondido also expanded from 2009-2019, but were moderately patchy compared to Cañada del Agua. We sampled two locations at each of these sites, and patchiness differed more between the two dive sites at Aguaje Escondido than at Cañada del Agua.

At Eagle Canyon, one of three transects fell entirely on bare sand, but the eelgrass on the other two was the highest mean density observed during the study, 65 shoots/m^2 with a single quadrat at 112/m^2.

Another big change was that the meadow at East Prisoners (in front of the wetland and canyon mouth) had mostly disappeared and the eelgrass that we did encounter was the lowest mean density of the study- 31/m^2.

Both Prisoners and Old Ranch at Santa Rosa Island have remained fairly uniform in cover.

Our site-checks at Cathedral Cove on East Anacapa found no evidence of eelgrass returning to this location (ship's fish finder and by SCUBA on 9/20/2016, and by ship's fish finder on 6/20/2019).

Flowering and Seedlings

Eelgrass flowering was detected at varying density within quadrats at nine sites (Figure 7). The greatest densities were found at Keyhole (4/m^2), Smugglers (2.9/m^2) and East NPS (1.53/m^2). Seedlings were found at seven sites, with the highest density at East NPS (1.13/m^2) and Keyhole (0.6/m^2). No flowers

or seedlings were found within quadrats at Prisoners Harbor, although developing flowers were documented at the site by photograph in April. Neither flowers nor seedlings were found at Frenchy's, East Scorpion, or East Prisoners.

Other quadrat categories

The white urchin *Lytechinus* was present in 16% of quadrats at Frenchy's (1.14/m^2), and a single urchin was found at East Prisoners. Parchment tube worms (mostly *Chaetopterus sp.*) were present in low numbers at all sites but were greatest at predominantly sandy sites (Frenchy's, East Scorpion, East Prisoners). The small red sea cucumber *Pachythione rubra* was found at two sites, Aguaje Escondido and Old Ranch, where they were only in a few of the quadrats but in especially high numbers at Old Ranch.

Fish Results

During site visits, sea lions were observed at Anacapa Island (East NPS and East Frenchy's) and harbor seals at Eagle Canyon, Santa Cruz Island.

Quantitative Transects

We completed 136 quantitative fish transects during the study. Each 30m x2m transect took 4-6 minutes to complete. Data for all transects are summarized in Table 4.

Size

Fish were generally recorded in 3 size categories (>30cm, 15-30cm, <15 cm), plus young of the year (YOY) but the three sizes have been lumped for density analysis, with the exception of a discussion of kelp bass sizes below.

Species

39 different species categories were found in total across all transects and all sites (Table 3). Density of the eight most common fish are shown in Figure 6. The two most commonly encountered species were kelp bass, *Paralabrax clathratus,* which were scored at all sites except for Frenchy's and East Frenchy's and in 65% of all transects; and senorita, *Oxyjulis californica,* which occurred in 40% of all transects. The third most common fish was black perch, *Embiotica jacksonii*, found at six sites and in 20% of all transects.

12 species were only encountered once. 9 of these fish taxa were bottom-dwellers.

YOY species

Surveys occurred too early in the year to catch many young of the year (YOY) fish. Fall surveys would have captured recent recruitment of typical species such as kelp bass, senorita, rockfishes and perches. Our surveys found YOYs of 4 categories: kelp bass, unidentified rockfish, black eye goby and giant kelpfish. Of these, giant kelpfish were by far the most common, occurring in 12.5% of all fish transects and at 6 of the 12 sites.

Kelp bass

The size classes of kelp bass found at all sites are shown in Figure 7. Size classes could help distinguish between legal and sub-legal size of kelp bass, a popular recreationally-fished species. However, in 2013 the DFG commission increased the minimum harvest size from 12” (~30cm) to 14” (35.6cm) length over all. We did not change our estimated size categories after this regulation was enacted, but it is not clear whether it would make a difference in results.

The greatest density of kelp bass overall (nearly twice that of other sites) was found at Scorpion. This SMR site had fish of all three size categories plus YOYs, and the largest fraction of small and medium kelp bass at any site. The lowest densities of kelp bass were found at the sites with little to no eelgrass, with the exception of East Frenchy's. A large sea lion was observed there during the monitoring, perhaps contributing to the general lack of fish seen on this particular survey as kelp bass were commonly encountered during the roving diver fish counts on a later date. The largest proportion of legal-sized (or close to legal) kelp bass were found at Keyhole and Scorpion, both within State Marine Reserves.

Perch

We encountered seven species of perch. The most perch and four out of the six most common species were found at Prisoners Harbor. Large schools of shiner perch were present over the transects at Prisoners, accounting for 27% of the total fish observed. Rainbow perch only were found at the two deep sites, Smugglers and Old Ranch. Black perch were at six sites, and white perch at four sites. No perch were seen at the predominantly sand habitat sites (East Frenchy’s, Frenchy’s, East Scorpion). No YOY perch were observed.

Elasmobranchs

We found three taxa of elasmobranchs along quantitative transects: horn sharks, leopard sharks and bat rays. Horn sharks were scored at East Frenchy’s, Scorpion, and Aguaje Escondido; leopard sharks at Aguaje Escondido, Cañada del Agua, and Prisoners. Bay rays were scored at Scorpion, Cañada del Agua, East Prisoners and Old Ranch.

Sheephead

Sheephead were found at seven sites. The greatest density was at Scorpion (0.86/transect). Males were only seen along transects at Scorpion and Cañada del Agua. No YOY sheephead were found.

Schooling Fish

We found three taxa of schooling fish: jack mackerel (two sites), topsmelt (three sites) and barracuda (three sites). All three occurred at both Scorpion and Cañada del Agua.

Senorita

*S*enorita were the most numerous common fish found and occurred at six sites and all three islands. The greatest number were found at Old Ranch SRI (22/transect).

Miscellaneous Fish

We found ~ a dozen taxa that were represented by single individuals at one or more sites. Scorpion had four of these species. Of note was the orangethroat pikeblenny, a benthic fish that shelters in empty shells or parchment worm tubes. In 1994 the published northern-range limit of this pikeblenny was extended to Frenchy's Cove, Anacapa Island, as reported by CIRP researchers. In April 2019, we found them at two locations on Anacapa (East Frenchy's, Frenchy's), and at East Prisoners, Santa Cruz Island where they were common on and off transects. At Prisoners we scored a moray eel and a white seabass, both unusual for a quantitative transect.

Roving Diver Fish Counts

A total of 33 combined species were recorded from Roving Diver Fish Counts at ten sites (Figure 10). Due to the restricted level of field effort, Roving Diver (RD) counts were not performed at all sites in replicate numbers and no surveys occurred at East Prisoners, Eagle Canyon, or East Scorpion. RD surveys were done in late June and July. A single survey was performed at two sites (Scorpion, Old Ranch), while the rest had 2-4 surveys each. Results shown are the Fish Average Abundance Index averaged for all observations at that site. The Fish Average Abundance Index takes into account the number of a particular fish seen and the time during the dive that the fish is first observed.

Anacapa eelgrass sites had 13-14 species, with the exception of Frenchy's Cove (no eelgrass) which reported 6 species. Santa Cruz sites ranged from 10 (Smugglers) to 17 species at Aguaje Escondido, the most species observed during a RD survey. Old Ranch at Santa Rosa had 8 species. The greatest number of species within an individual single 30 min count were recorded at East Frenchy's. It should be noted that on the day that the quantitative surveys were done at East Frenchy's, there was a sea lion actively swimming through the area and fish were scarce. The lowest number of fish species observed was at the Frenchy's restoration site, over barren sand.

Kelp bass and Senoritas were universal across all sites. Opaleye, the only predominantly herbivorous fish seen, were found at all sites except for Frenchy's and Old Ranch. Sheephead were common within the SMR at Scorpion. They were uncommon along middle Anacapa SMR sites, rare at Northern SCI sites and absent from Prisoners and Old Ranch.

Shiner surfperch are schooling fish. They were common to abundant at Scorpion, Prisoners, and Old Ranch, and rare at East NPS, Aguaje, and Cañada del Agua. Black perch were found at all sites except at Frenchy's. They were common at Smugglers and Prisoners. White perch were only found at the four northern SCI sites, where they ranged from rare to common. Pile perch were found at all sites except at Frenchy's and Smugglers.

Many taxa were only recorded as individuals and/or at one site, or in one survey at a particular site.

These include schooling fish such as yellowtail (Frenchy's), barracuda (Scorpion, Aguaje) and salema (Prisoners). The stand-out was giant sea bass, where two individuals were seen at the end of the fish count at Keyhole, Middle Anacapa Island in June 2019.

Four taxa of flatfish were observed. Three of these were found at only Anacapa sites (halibut, c-o turbot, sand dab), while one fantail sole was observed at Old Ranch.

Four taxa of elasmobranchs were observed during RD counts, with most seen at Prisoners, Cañada del Agua, and Aguaje Escondido. Angel sharks were seen at East NPS and Cañada del Agua.

Comparison of Methods

Both Roving Diver (RD) and Quantitative transects were performed at ten of the thirteen sites. At six of these, RD yielded more species. Because the observer swims throughout the eelgrass meadow during the count, Roving Diver surveys, at 30 minutes in length, may constitute a more comprehensive snapshot of fish assemblages. Transect surveys only record those fish that swim within the transect corridor. The two methods, while distinct, are complementary in describing fish assemblages.

Fish Species Richness

We calculated fish species richness as the total number of fish taxa seen at a site considering all methods (Figure 8). By far the greatest number of taxa (22) and the most fish per transect (44.43) were found at Scorpion, followed by Cañada del Agua and Aguaje Escondido. Eagle Canyon and East Scorpion had the fewest fish and were the least diverse.

2019 Band transects results

Invertebrates

76 individual band transects were counted, for a total of 4,560m² of sea floor habitat. 34 different taxa were recorded across all band transects during the study. Most taxa were not found at every site; sites varied in species richness and composition (Table 5).

In general, the major invertebrates found within eelgrass meadows are species that may also be present on bare sandy bottoms or on rocky reefs. This is not surprising, given that rocky reefs are bordered by sand and many of the smaller eelgrass sites are close to rock habitat. The eight most commonly encountered species are shown in Figure 11.

The most numerous animal found at any site was *Pachycerianthus fimbriatus*, a tube-dwelling cerianthid anemone, which was extremely common at the four northern SCR sites from East Prisoners to Aguaje Escondido. The highest mean density occurred at Eagle Canyon with 128/60m², followed by 96/60m² at East Prisoners. Surprising, there were only 2/60m² at nearby Prisoners Harbor. Low densities occurred elsewhere, and none occurred at Smugglers or Scorpion.

The wavy top snail *Megastraea undosa* was common at all but three sites (East Scorpion, Scorpion and Old Ranch). The greatest density was found at East Frenchy's, at 45 snails/60m² transect.

Bivalves were also common at several sites, this category was comprised of at least 3 different genera (*Tresus*, *Zirfaea* and *Panopea*; species not always scored separately and so were lumped for this report). Bivalves were reported at eight out of the thirteen sites.

The sand star *Astropectin armatus* was found at eight study sites, with the greatest density at Frenchy's. The only other star found in our transects was the bat star *Patira miniata*, which was found at Old Ranch and in low abundances at Frenchy's and Aguaje Escondido.

The warty sea cucumber *Parastichopus parvimensis* was found at seven sites, and was the most common at Frenchy's and Eagle Canyon.

Seven taxa of crabs were found (Table 3) but in low numbers. They are shown combined for the category 'all crabs' in Figure 11. No crabs were found at any of the Anacapa sites in 2019.

The only sea urchin found during our surveys was the white urchin *Lytechinus anemesus*, found at Frenchy's at 28.2 per 60m^2 transect (equaling 0.47 per m^2).

The sea pen *Stylatula* and sea pansy*Renilla* were generally co-occurring. Sea pansies were the most common at Aguaje Escondido and Eagle Canyon.

Brown macroalgae were also scored in band transects (data not shown). Three taxa were found. The invasive *Sargassum horneri* was found at all four Anacapa Island locations, but individuals were very small and were growing on either small rocks or shells. Giant kelp recruits were found at East NPS and at Old Ranch, while *Stephanocystis osmundacea* was found at Smugglers and Prisoners. All brown algae were growing on hard surfaces.

By Site Comparisons of Invertebrates

We sampled three pairs of sites, that resulted with one a dense eelgrass meadow and the nearby second site mostly or all sand plain. This difference in eelgrass habitat appeared to make a difference in major invertebrate taxa. Prisoners and East Prisoners are 250 meters apart, but only shared four invertebrate species in common. There were nearly twice as many taxa found at East Prisoners than within the dense eelgrass bed within the cove. East Prisoners had been a continuation of the Prisoners meadow tens year prior (the sites are ~ 300 meters apart). It is possible that the sediment grain size and organic content is different between the two sites, due to the river mouth or along-island current patterns, as East Prisoners had very high densities of tube anemones.

Scorpion and East Scorpion, although 500 meters apart only shared rare wavy turban snails in common. The day that Scorpion surveys occurred, there was a lot of drift algae obscuring the bottom for much of the transects. We attempted to move it aside but it made surveys more difficult. We found no evidence that there had been a moderate size eelgrass meadow at East Scorpion. The sediment seemed fairly coarse, with scattered rocks, and the area is more exposed. We have no historical information on an eelgrass bed in this location.

Frenchy's and East Frenchy's, 265 meters apart, shared six species in common, but wavy turbans and bivalves were much more common at East Frenchy's. White urchins *Lytechinus* were only present at Frenchy's, at similar densities to wavy-top snails.

Major invertebrate composition and density were consistent throughout the larger sites that had two sampling locations similarly spaced (Smugglers, 560 meters apart, and Old Ranch, 260 meters apart), and that were moderate or dense eelgrass cover.

Invertebrate Species Richness

Invertebrate species richness at all dive sites is shown in Figure 13. The richest locations were East Prisoners and Aguaje Escondido, followed by Eagle Canyon. These three sites fall within a 1,200 meter stretch of of coastline.

Results and discussion of comparison with Reef Check

Our assumption was that the density and species richness of fish and invertebrates associated with eelgrass would be less than at near-by kelp beds, even when sampled at the coarse scale of this study. We compared our data to that collected by Reef Check, a program that has been monitoring rocky reefs inside and outside of Marine Protected Areas throughout California, including at the Channel Islands, since 2006, and that uses similar methods to those used in this study to score a set list of species. We compared means for several common species from three Reef Check sites (summarized in their Final Report, South Coast MPA Baseline Monitoring Report (data 2011-2014) with one of our nearby eelgrass sites. Kelp bass were three times as dense within Scorpion eelgrass, and four times as dense within Anacapa eelgrass, as on the corresponding rocky reefs. There were 35 times more wavy turban snails in the Anacapa eelgrass than on the rock reef. Overall, though, there were more taxa of major invertebrates on the reefs.

Data Correlations

We ran a Spearman's rank correlation to create a matrix of meadow extent, fish richness, and invertebrate richness, to examine and test for any relationships (Figure 14). The factors considered were Site ID (from west to east, representing gradient across channel), Meadow Percent (percent cover along transect), Meadow Class (density scale 1-4), Fish Species from Quantitative transects, Fish Species Richness Total, and Invertebrate Species Richness. There was a strong and significant positive correlation between Meadow Percent and Meadow Class, which was expected. There was also a strong positive correlation between Meadow Class and Fish Total Richness, with a weaker positive correlation between Fish Total Richness and Meadow Percent. There was a significant negative relationship between Invertebrate Richness and Meadow Class, and Meadow Percent.

To further examine these correlations, we ran regressions separately for species richness as a function of eelgrass meadow extent (percent cover), for fish and invertebrates (Figure 15). In both cases, there was a significant relationship between species richness and eelgrass meadow extent (positive for fish, negative for invertebrates).

We compared shoot density between six natural beds at Santa Cruz Island and three restored beds at Anacapa Island that resulted from our 2002 restoration effort (Figure 16). There was no significant difference based on overlap of the 95% confidence interval around the median.

We compared species richness between six natural beds at Santa Cruz Island and three restored beds at Anacapa Island that resulted from our 2002 restoration effort, for fish (Figure 17) and invertebrates (Figure 18). In both cases, there was no significant difference (Kruskal-Wallace test) between the mean species richness at restored meadows and natural meadows, even though there was a greater range in diversity at natural beds.

Finally, we compared eelgrass shoot density at six sites across multiple years (Figure 19).

Discussion

It is clear from our surveys that eelgrass madows create lush, three-dimensional habitat for a range of other species large and small. The majority of eelgrass meadows at Santa Cruz Island appear to be stable over time in location and scale, even after two years of elevated water temperature from el Niño and marine heatwaves in 2014-216.

How stable over time are shoot density and meadow extent in naturally occurring eelgrass beds?

We compared quadrat data from sites 1-3, 5, 7, 9 in 2019 to 2016, 2008-9, and 1994, 1995, 1997 (Figure 19). Not all sites were sampled at every period. Overall, there was a trend of declining and partially rebounding shoot density, with some sites more severe or significant than others. The most dramatic decline over the period was at Scorpion, where density has declined by two-thirds since 1997, and from a record high of 188 shoots/m^2 in 2001 (data not shown). We also compared eelgrass cover along transects at four Santa Cruz Island sites in 1994, 1995, 1997, 2009 and 2019 (Figure 20). Three of the sites are remarkably stable over time. East Prisoners, although only sampled twice, suffered massive losses of eelgrass habitat in addition to density over ten years. This site is in front of the river mouth at Cañada del Puerto.

How similar in size and density are the restored meadows at Anacapa to naturally occurring beds at Santa Cruz and Santa Rosa?

We compared quadrat data from pooled Anacapa sites 11-13 to pooled sites 1, 2, 5, 6, 7, 9 in order to test for differences between eelgrass meadow density (Figure 13). There was no significant difference in density between the two groups.

Do the restored eelgrass meadows at Anacapa perform at the same habitat level as naturally occurring beds at Santa Cruz?

To address this question, we compared the fish and invertebrate species richness levels at pooled Anacapa sites 11-13 to pooled SCR sites 2, 5, 6, 7, and 9 (Figures 17 and 18). There was no significant difference between total species richness of either fish or invertebrates between the sites. However, there was a greater range in fish diversity at Santa Cruz sites. The eastern Santa Barbara Channel experiences warmer currents coming up from the south and it is well known that the assemblages of fish and invertebrates are structured by the current regime, with assemblages more similar to southern islands than to the more western islands (as summarized in Airamé 2003). All of the eelgrass meadows within this study, with the exception of Old Ranch at Santa Rosa (removed from this analysis), fall within the eastern Channel regime and California Province (Hamilton *et al.* 2010), with Prisoners falling a few kilometers to the east of the accepted cold/warm current boundary. It is not too surprising that similar assemblages of fish and invertebrates were found at all sites. However, there were some differences, most noticeable with surf perch. Roving diver surveys found that pile and black perch were present at both islands but more common at Santa Cruz, while white and shiner were almost entirely absent from Anacapa. Our study did not sample for epifauna such as copepods, amphipods, and small mollusks, which are an important part of the food chain especially for fish predators. We hope to do this additional work in the future.

Do eelgrass beds within reserves and their associated fish and invertebrates differ from those outside?

We encountered more bat rays at Scorpion than at any other site. Interestingly, there were very few wavy turban snails within transects at Scorpion. At other locations, wavy turban snails are a major herbivore within eelgrass meadows. We have observed remnants of crushed turban snail shells within

bat ray feeding pits at other sites, so it may be that rays can break apart the thick shell of even large turban snails with their stout jaws. Other known predators include seastars, lobsters, and fish such as sheephead and cabezon (mostly likely preying on smaller, younger snails). Scorpion also had the highest abundance of sheephead. Our findings suggest that the protective SMR status at Scorpion has fostered the survival and growth of large predators, allowing eelgrass to be released from grazing pressure.

Does eelgrass extent/coverage/patchiness affect determine fish and invert species richness, abundance?

There is evidence from seagrasses world wide that patchiness can affect both recruitment and survival of organisms living within (Bell *et al.* 2001, Healey and Hovel 2004, Lefcheck *et al.* 2016). From the present study, no fish were counted along 18% of the total core transects, and 83% of those transects without fish also had little to no eelgrass cover. We plan to compare species assemblage to eelgrass density categories (dense and moderate areas to sparse and very sparse) but this analysis has not concluded at the time of writing.

Implications for location of marine protected areas/ fishing boundaries

During the process of designating reserves in Federal waters around the Channel Islands, it was stated that “The existing State marine zones protect a variety of species of interest, including marine algae, seagrasses, invertebrates, and fishes… Eelgrass and surfgrass beds, which serve important roles as nursery habitat for young invertebrates and fishes, are protected in North Anacapa Island SMCA...” (54 FINAL_Resources_FEIS_4_13_07_v5, CINMS). The decision to create an area open to trap fishing was justified with “All extractive activities and injury to Sanctuary resources would be prohibited in the marine conservation area with the exception of lobster harvest.” At the time of the initial island reserve designation process (2002-04), our eelgrass restoration project was underway but success was uncertain. The fact that the geographic orientation of Frenchy’s Cove allowed for the historic persistence of the largest eelgrass bed throughout all of Anacapa Island, was not considered. There was intense pressure from the fishing industry to keep some part of the north side of Anacapa open, and the resulting boundary line was drawn within Frenchy’s Cove at the separation between North and Middle Anacapa.

The effect of trap fisheries on the benthos has been examined mainly for rocky habitat with most researchers concluding that deployment of traps results in little lasting damage (Shester and Micheli 2011) especially when considering the value of the fishery (SCS 2004). As seagrass systems world-wide are targeted for a variety of trap-caught fishes and invertebrates, there has been interest in determining the environmental cost of fishing over soft-bottom habitat. The effect of trap fishing on two different species of Atlantic seagrass was investigated within the Florida Keys National Marine Sanctuary (Uhrin and Fonseca 2005). A key finding was that the two species within the study, which differed in root and rhizome structure, responded differently to the disturbance. The shallow rooted seagrass was more easily dislodged and slower to recover. Another consequence of frequent

disturbance to seagrass is fragmentation of the bed. If the seagrass cannot respond through vegetative growth to keep up with or outpace the disturbance, then the fragments may continue to shrink until they lose the capacity to function as a cohesive habitat and drop below a sustainable threshold. Studies in the Mediterranean Sea have found that constant anthropomorphic disturbance leads to higher fragmentation of meadows (Montefalcone *et al.* 2010) which has implications for meadow function and recovery.

In California, fishermen are required to raise and service traps at intervals not exceeding 96 hours, weather permitting (FGC § 9004, revised from 72 hours). The trap is hauled, serviced and redeployed while the boat drifts out of gear (Altstatt, personal observation). At the beginning of the season, traps may be pulled and redeployed daily. *Zostera pacifica* is shallow rooted with rhizomes extending only a few centimeters in to the sediment. There is ample evidence of significant damage from vessel anchors, which, like traps, are heavy metal objects that are frequently deployed and redeployed, in all of the Channel Islands eelgrass sites. Based on the total loss of our restoration site within an area that has only recently become heavily fished, and decades of other observations, we surmise that *Z. pacifica* is extremely susceptible to disturbance from trap fishing.

The California Department of Fish and Wildlife acknowledges that the recent increase in commercial fishing effort has raised questions about the… 'negative consequences on the fishing grounds and associated ecosystems from increased gear usage' (California Spiny Lobster Fishery Management Plan, April 2016). The Plan states that hard bottom is the primary lobster habitat and that traps are set on the bottom in rocky areas. There does not appear to be any expectation that traps will be set in areas that are not hard bottom, and especially not in sensitive seagrass habitat.

In 2014, we learned from mariners that Frenchy's Cove was being fished heavily during the two months (November, December) that the brown pelican Special Closure was open. We were unable to return for dive surveys until the summer of 2016, four years after our last survey visit in 2012. In the summer and fall of 2016, we marked and reported 4 abandoned lobster traps within Frenchy's Cove, with one along the boundary with the SMR. The other three traps were within the 2012 mapped footprint of the eelgrass restoration site, where there was no longer any eelgrass remaining. On November 4 2016, NPS rangers reported "hundreds of traps" within the SMCA. In June 2019, we discovered an abandoned trap "ghost fishing" and filled with live lobsters along the SMR boundary line. In November 2019, CINMS staff reported at least 100 traps along the SMR boundary line, with another 100 to the west further within the SMCA, some as shallow as 17' (note that DFW prohibits commercial trapping in water depths shallower than 20'). Eelgrass continues to thrive within the SMR, 200 meters to the east.

The marine reserve network at the Channel Islands went in to effect in 2003. Frenchy's Cove was not traditionally an area targeted by lobster fisherman as nearly all of the shallow bottom substrate is soft rather than rocky (Altstatt, personal observation). However, a network of reserves was establish on the mainland in 2012, excluding fishers from no-take areas and concentrating that effort elsewhere. Fishing block data for the mainland showed that effort more than doubled within blocks containing fishing

areas adjacent to SMRs (Lenihan *et al.* 2021). Visual inspection of the trap marker floats in November 2019 reveal that at least nine different fishermen set traps along the SMR/SMCA boundary and within Frenchy's Cove. Even though California's marine reserve system may be 'an integrated, well-enforced network of no-fishing zones designed to protect productive subtidal rocky reefs that are essential habitat to populations of many target species' (Lenihan *et al.* 2021) it is apparent that the intentional and dramatic increase in fishing effort along all SMR boundaries (regardless of bottom type) has degraded the eelgrass meadow habitat and has extirpated eelgrass from within the Anacapa SMCA. Although we had originally chose a location that we believed to be protected for 10 months out of the year (within the Anacapa Special Closure), the intensity of the fishing effort during the open two months was enough to disturb, and eventually eliminate, the restored eelgrass meadow within the SMCA. This unexpected finding showcases the need and value of marine reserves and has serious implications for habitats that are exposed to trapping. Although our restoration work has restored more than 30 acres of eelgrass meadows, it could have failed had there not been a SMR established adjacent to our original site, and if the implementation of the mainland reserves occurred sooner.

A next step to further understand how fishing has changed around Anacapa after the mainland reserves went in to effect, and the resulting impact to the seafloor, would be to analyze the catch data from reporting block 684 (North Anacapa Island). This information has been requested from the Department of Fish and Wildlife (March 2021).

Changing Climatic Regime

Zostera beds at the Channel Islands face increasing threats from multiple stressors, including increasing frequency and severity of storms, as seen by the dramatic change in eelgrass bed size, density and extent at East Prisoners between 2009 and 2019. Factors may have included a combination of big rainfall years and change in hydrological function of Cañada del Puerto following NPS wetland and canyon restoration. There was evidence of scour, evidence of deposition of cobbles and tree limbs into the eelgrass meadow habitat immediately offshore of the canyon mouth as far as 30' depth. Google Earth photo shows extreme turbidity where we had mapped eelgrass in 2009 and where is lacking now. We witnessed a similar event happen at Scorpion in December 1997, where a historic micro-burst created a flood within Scorpion Canyon leading to sediment deposition and loss of more than a third of the eelgrass bed (data not shown).

Warm water events

Multiple large-scale warm water events have occurred during the time frame of our eelgrass monitoring, beginning with the 1983 el Niño. The long-term trend of increasing sea surface temperatures (SST) apparently contribute to the duration and intensity of marine heatwaves events (MHW) (Fumo *et al.* 2020). In 2014 a large MHW event known as 'the Blob' persisted and combined with warming from the 2015-2016 el Niño to create one of the strongest and longest-lasting SST warming events on record (SCCOOS). Indeed, positive temperature anomalies persisted in to 2020.

Depth may not be a refugia from such events as glider data found that the temperature anomaly extended to more than 100m in the water column.

Lab studies have shown that for the sympatric species, *Z. marina*, plants exposed to elevated temperatures (7C above ambient) respond with significantly reduced growth, shoot density, productivity and biomass (Kim *et al.* 2019). The MHW event in Southern California produced long-lasting temperatures elevated 4C above ambient, but similar studies have not been done for *Z. pacifica* nor did the authors test a range of elevated temperatures. Our photos of eelgrass from 2016 clearly show a progression of yellowing in leaves that is more pronounced in September of that year. Yellowing can be related to loss of tissue and chlorophyll and is an indication of overall stress. It has been shown that depth may serve as a refugia (Aoki *et al.* 2020) for intertidal and shallow subtidal *Zostera marina* in Virginia USA, but whether that holds for our much deeper, subtidal *Z. pacifica* when confronted by longer lasting, more extreme MHW events remains unclear.

Implications for disease

Several years of sustained unusually warm water resulting in bleached and yellowish *Z. pacifica* leaves with black spots of disease increasing throughout the summer of 2016 (Plate # 10). Anacapa sites look particularly bad by September, with leaves cropped, black and decomposing. This condition was documented throughout all Santa Cruz major eelgrass meadows to a lesser degree.

As reviewed in Sullivan *et al.* (2017) the risk to seagrasses from disease may be amplified by stressors from climate change. However, the possibility of a genetic component to resiliency to warming waters (Franssen *et al.* 2011) cannot be overlooked, especially at the Channel Islands where large meadows of *Z. pacifica* have likely existed for many thousands of years since diverging from *Z. marina* (Coyer *et al* 2007).

Loss of Blue Carbon

Arias-Ortiz *et al.* (2018) found that 36% of the largest expanse of Australian seagrass meadows were damaged by a MWH event in 2010/2011, leading to potential massive losses of stored ‘blue carbon’ from the sediment. In Virginia, documented declines in seagrass density and extent as a result of marine heatwaves led to the loss of stored carbon (Aoki et al 2021). To date, there have been no sediment analyses done in or near eelgrass meadows at the Channel Islands, but the contribution of stored carbon by eelgrass could be significant.

Vulnerability to mass recruitment events

Following the 1982-83 el Niño, white urchins and brittlestars recruited to mid-depth rocky reefs around Anacapa and the eastern end of Santa Cruz. The white urchins also settled on sand, which led to eventual over-grazing of Anacapa eelgrass meadows in the late 1980s. In 1991, urchin density remained high at 60/m² at Frenchy’s even though the eelgrass was gone, but had declined to 0/ m^2 by the time our restoration began in 2003. Since then, subsequent warm water events have led to migration

or recruitment of warm-water invertebrates such as pelagic red crabs, white urchins and wavy turban snails. All three of these were observed at Anacapa in 2016. Size frequencies of white urchins in 2019 at Frenchy's revealed smaller urchins (compared with historic CIRP data), most likely resulting from the prior wave of recruitment 3-4 years before. Even though urchin densities were the highest at Frenchy's out of all of the 13 sites surveyed in 2019, their numbers were still quite low when compared to the densities that persisted following the late 1980s eelgrass over-grazing event. Other seagrass overgrazing events have been linked to persistent urchin densities greater than >22/m^2 (Rose *et al.* 1999). Recruitment to this area may be tied to small-scale very localized hydrology as white urchin numbers were extremely low only 200 meters away across the cove.

Recommendations and Conclusions

Science

The scope of the present study was extremely limited, but given the findings, additional work is both warranted and necessary to help resource managers prioritize future conservation measures.

- quantify the contribution of seagrass to carbon storage—perform sediment/CN grain size analysis for all eelgrass bed sites- old beds vs young beds;
- re-survey the 3 main beds at SCR plus ANA sites using detailed survey methods from CIRP 1994-97 cruises to quantify complete ecosystem function of restored beds, and whether main beds are still serving same role as 25 years ago—collect infauna/sediment cores, and perform detailed epifaunal survey at each site;
- primary production and biomass estimates;
- fish surveys in fall to capture recruitment events;
- C-14 analysis of fish and inverts in and out of eelgrass beds to quantify contribution.
- Using finding from this report, and from future work, identify island eelgrass meadows that provide most ecosystem benefit and those that are at highest risk from climate change.

Policy

We recommend specific actions that would have immediate and direct positive impact on eelgrass meadows.

1. **Re-classify the shallow soft-sediment bottom within the Frenchy's SMCA as SMR or No Entry (it is already a Special Closure 10 months out of the year).** Suitable habitat for eelgrass within Frenchy's Cove only exists within certain hydrodynamic and depth parameters (20'-45'), and over soft bottom not rock. This area historically sustained the largest eelgrass meadow at all of Anacapa Island. Our restoration work showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (trapping) were to cease.

2. **Act to reduce damage from anchoring and mooring within eelgrass beds, particularly within SMRs (Scorpion).** This is surely the easiest and most cost-effective way to reduce anthropogenic disturbance, especially where it is as well documented as the eelgrass meadow within the Marine Protected Area at Scorpion.

3. **Use adaptive management to protect the meadows providing greatest ecosystem benefit and are at highest risk from climate change, and consider restoration in key locations that may provide refugia from a changing ocean environment.**

The majority of nearshore habitat around the northern Channel Islands is sandy, and yet only a small fraction of that can sustain persistent eelgrass meadows due to exposure, depth and sediment gain size/ nutrient content. Eelgrass meadows, like kelpbeds, provide a suite of functions that greatly enhance their value far past that factored only on sea floor extent. Our surveys show that island beds contribute food, shelter and habitat to fish and invertebrate species, this function has been stable over decades at the largest beds, and that restored beds (15+ years post restoration) are providing the same function at Anacapa. This study should serve as justification for more in-depth work to look at long-term food chain biodiversity, nutrient cycling, resiliency to changing climatic factors, and carbon storage. And, as eelgrass is universally valued as Essential Fish Habitat, every effort must be made to protect it both inside and outside of SMRs.

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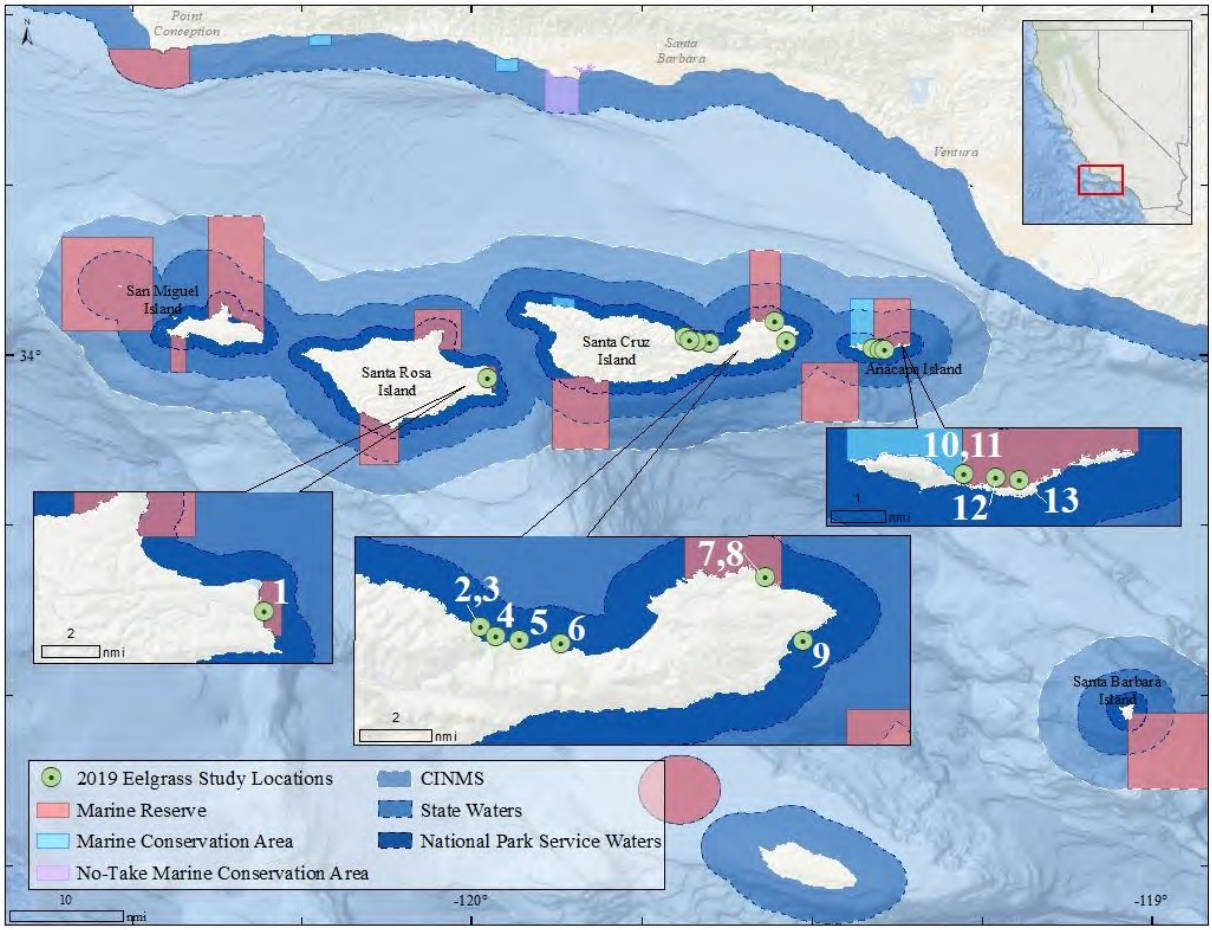


Figure 1. Location of study sites for 2019 eelgrass surveys. Sites are numbered 1-13 from west to east. Numbers refer (in order) to site names: Old Ranch SRO, Prisoners SCR, East Prisoners SCR, Eagle Canyon SCR, Cañada Agua SCR, Aguaje Escondido SCR, Scorpion SCR, East Scorpion SCR, Smugglers SCR, Frenchy's ANA, East Frenchy's ANA, Keyhole ANA, East NPS ANA. SRO= Santa Rosa, SCR= Santa Cruz, ANA= Anacapa. Other known locations of eelgrass not shown.

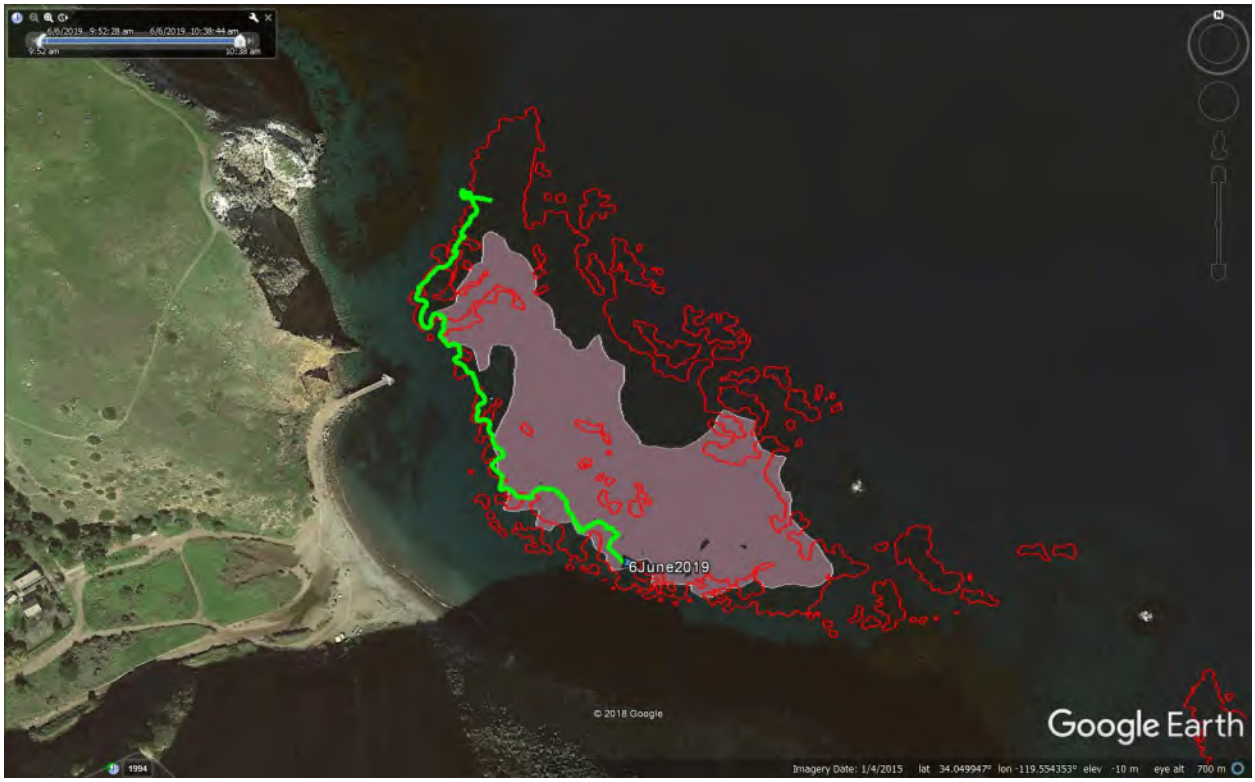


Figure 2. Trackline of meadow edge at Scorpion in June 2019 (green) compared with 2015 sonar mapping (red) and 2009 diver surveyed and mapped area (pink).

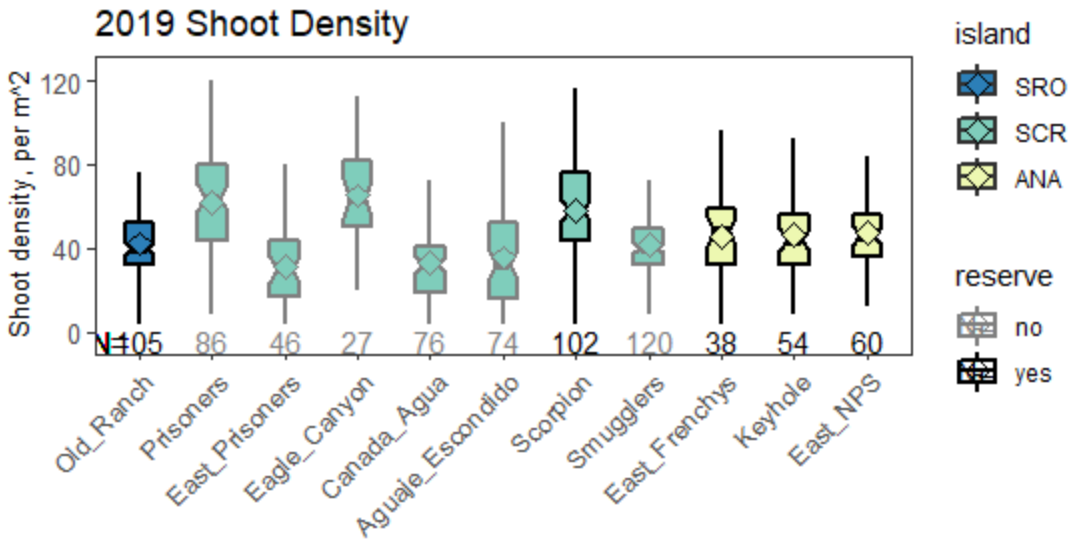


Figure 3. Boxplot of shoot density in quadrats with eelgrass present in 2019. N refers to the number of quadrats with eelgrass present per site. Boxplots are presented as follows: boxes show the interquartile range, whiskers represent the upper and lower quartiles, horizontal lines represent the median, diamonds mark the means, and notches show the 95% confidence interval of the median. Shading denotes island and outline denotes reserve status. Outliers not shown. Frenchys (N=0) and East Scorpion (N=3) not shown.

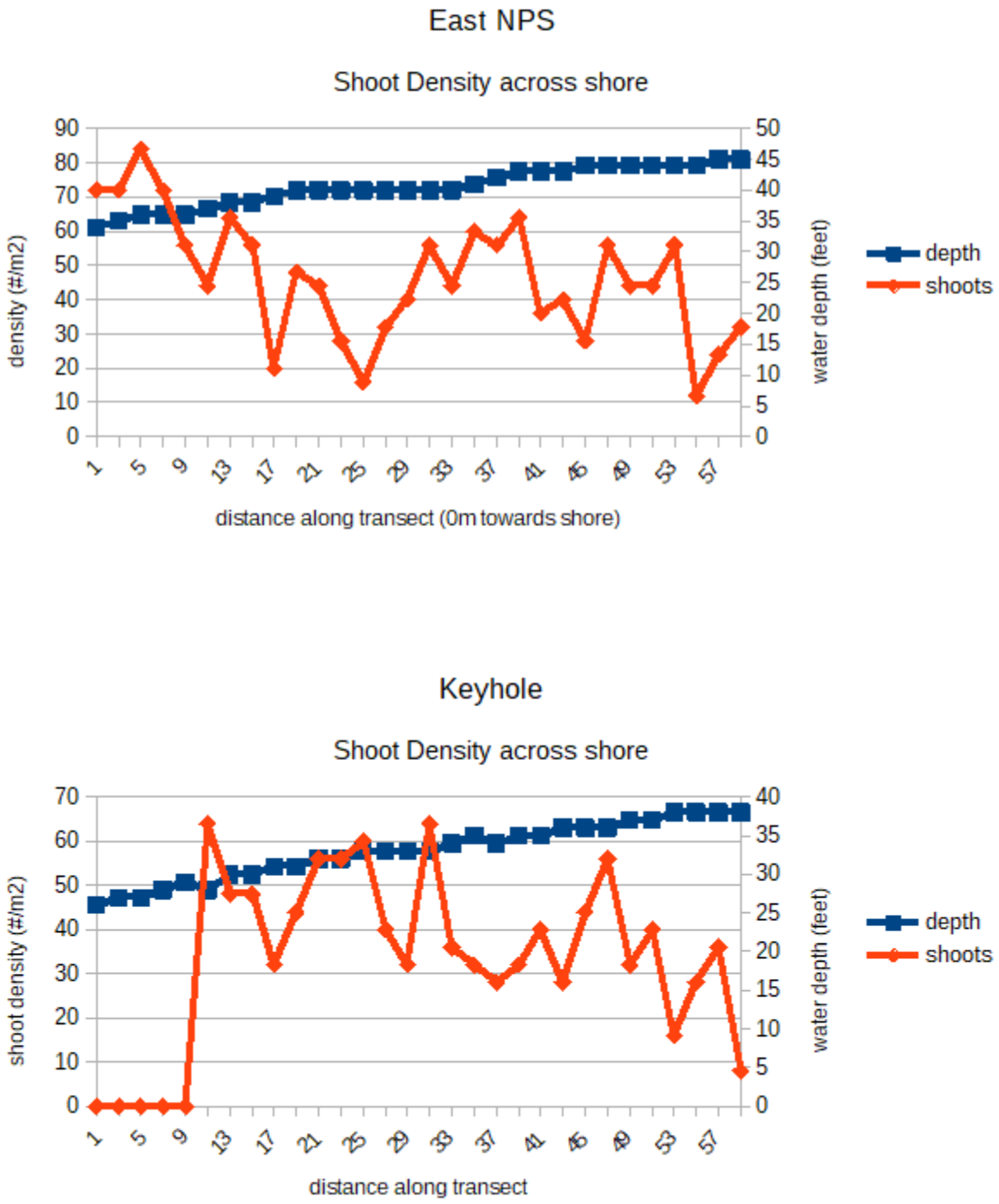


Figure 4. Eelgrass shoot density and depth from across shore (shallow to deep) 60m transects at two Anacapa locations.

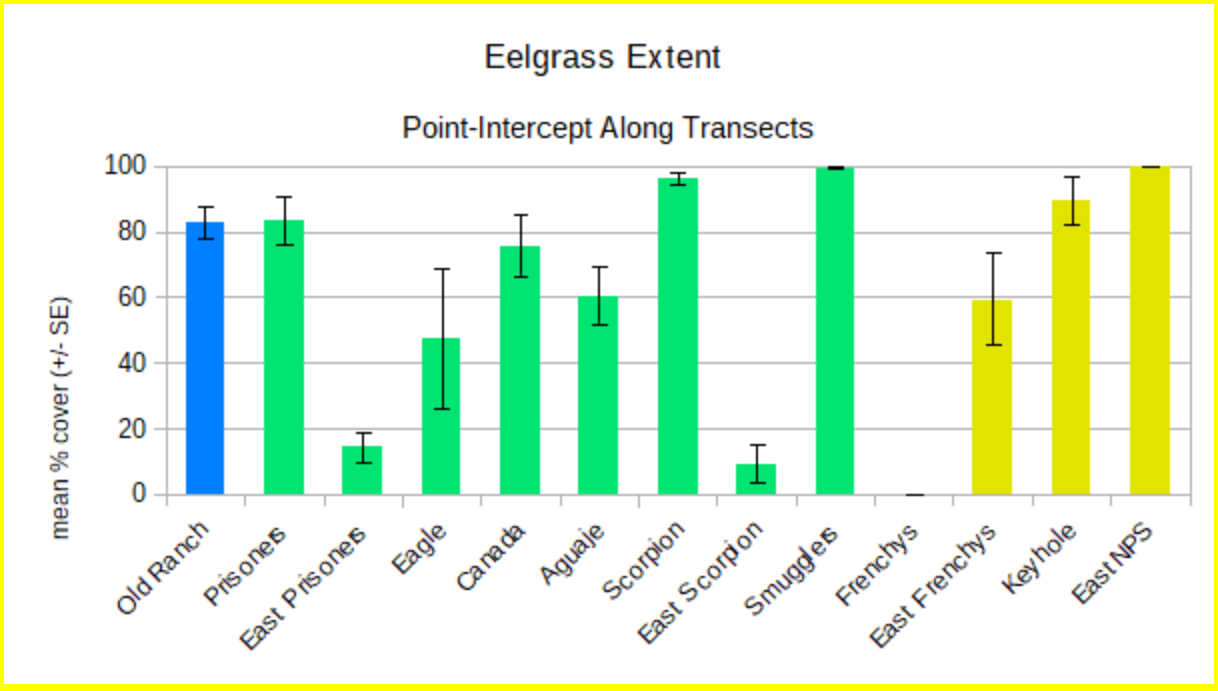


Figure 5. Mean eelgrass cover from point-intercept data for all core transects. Number of transects by site N= 8,7,9,3,5,8,8,4,8,5,4,4,4.

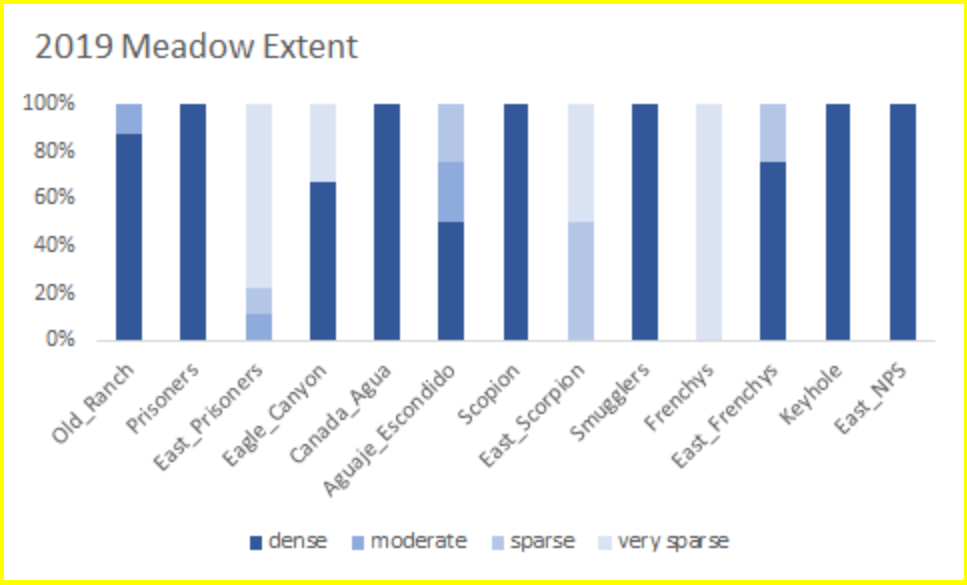


Figure 6. Eelgrass meadow extent as measured by point-intercept along core transects. Percent cover converted to density scale (Very Sparse= 0-10%, Sparse=10-40%, Moderate= 40-70%, Dense = 70-100%. Number of transects by site= 8,7,9,3,5,8,8,4,8,5,4,4,4.

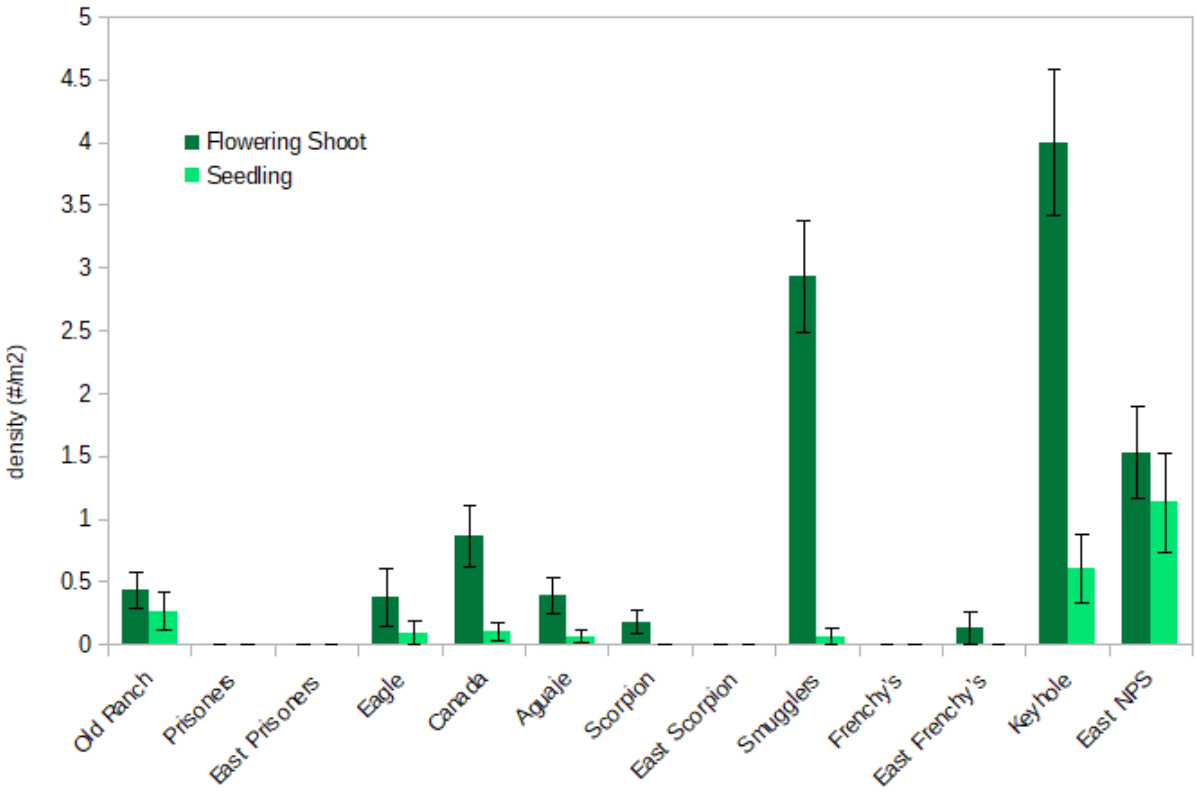


Figure 7. Density (means +/- standard error) of eelgrass flowering shoots and seedings from quadrat data.

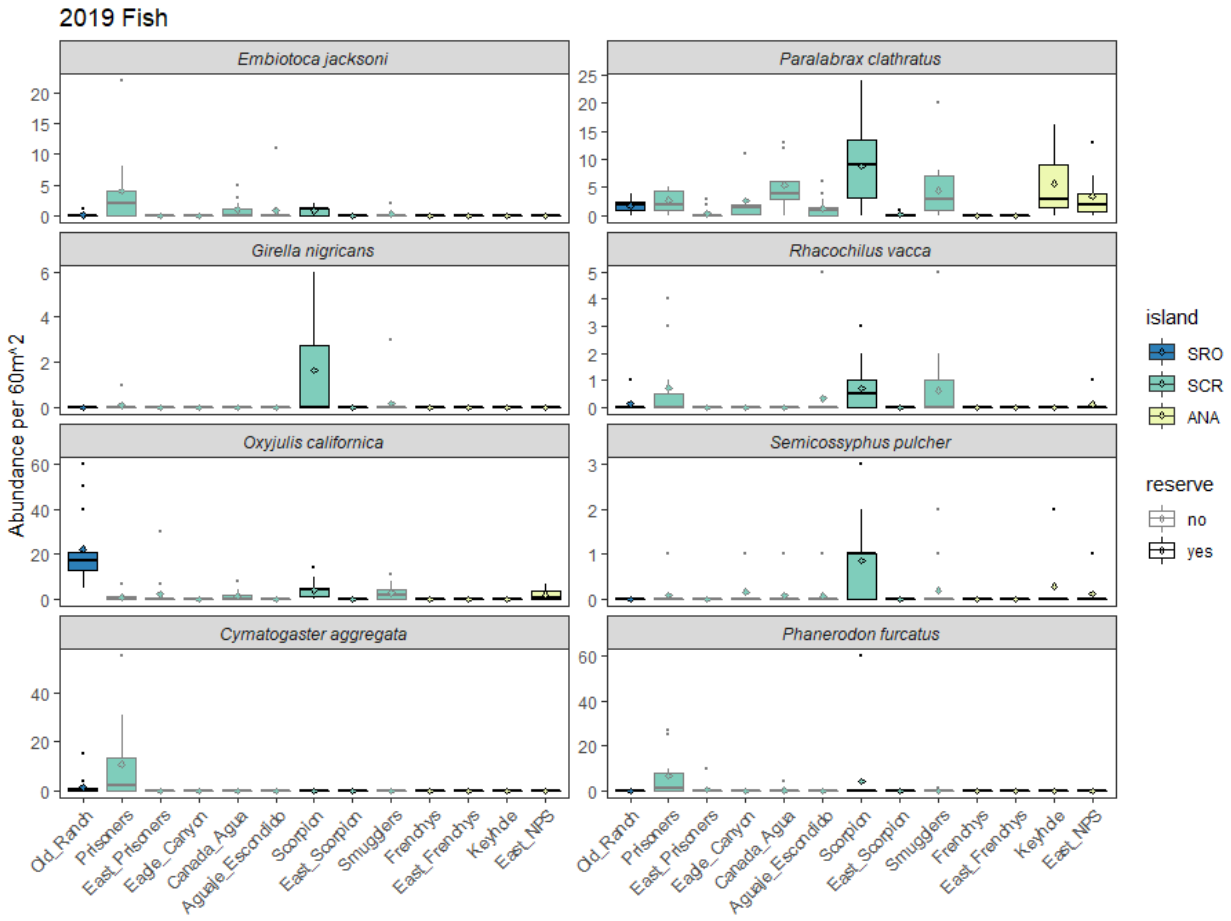


Figure 8. Fish abundance (per 60m^2) across sites for select taxa in 2019. Bars represent average value of band 60m^2 transects (core plus extra).

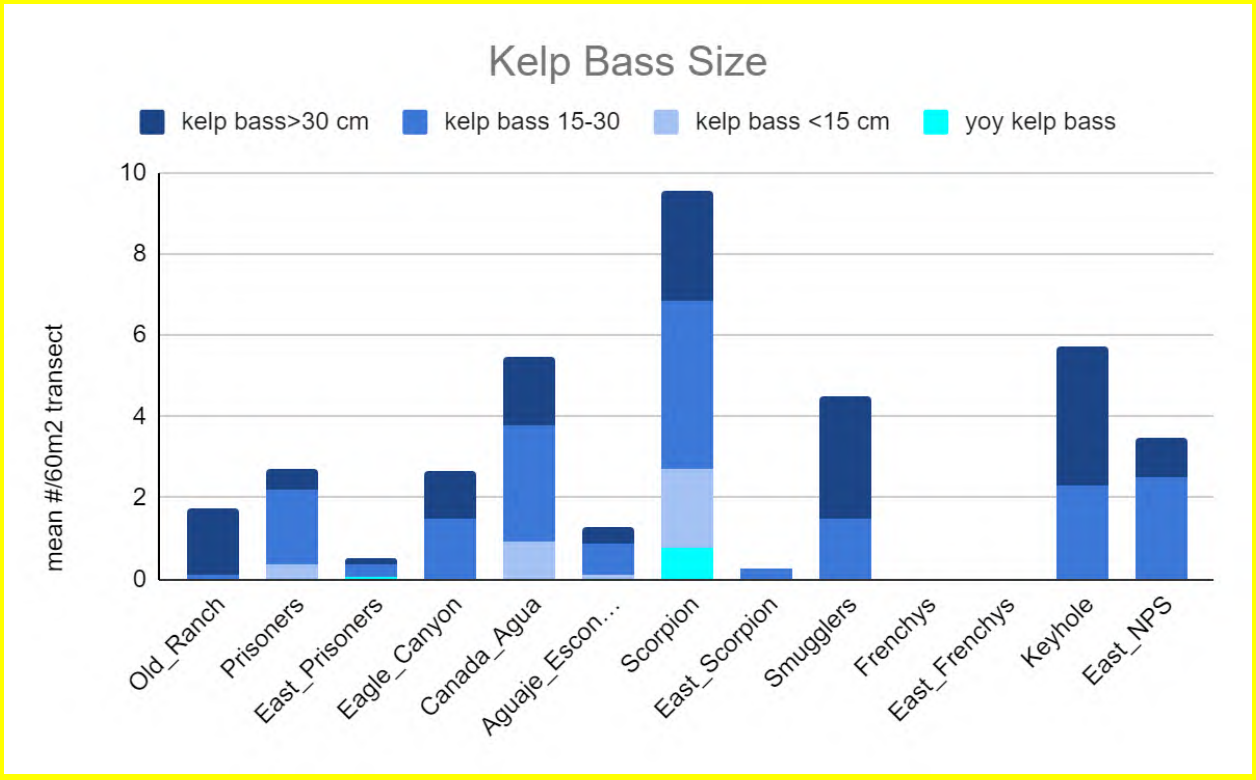


Figure 9. Density of kelp bass by four size classes at all 13 sites. Data are means of quantitative fish transects (core plus extra).

Site	Old_Ranch	Prisoners	Canada_Agua	Aguaje_Escondic	Scorpion	Smugglers	Frenchys	East_Frenchys	Keyhole	East_NPS
angel shark			0.60							1.00
barracuda				1.80	0.90					
bat ray			0.93	1.37	2.00					
black surfperch	1.00	3.00	1.96	1.03	2.00	3.00		1.47	1.10	1.27
blackeye goby							0.70			
blacksmith								1.80		
c-o turbot								1.00	0.90	0.70
fantail sole	0.70									
giant kelpfish		2.53	1.93	2.03	0.50			1.20	1.33	
giant sea bass									0.80	
giant seabass									1.60	
halfmoon			2.05	1.60		0.80		1.80	0.60	1.50
halibut							1.00		1.05	1.20
horn shark		0.50		0.60				0.95		
jack mackerel				2.85						2.60
kelp bass	3.00	3.00	3.20	3.20	3.00	2.90	2.00	2.53	3.50	3.22
leopard shark		1.25	1.80	1.28				0.55		
ocean whitefish					1.00				0.70	
opaleye		1.60	2.10	0.60	1.80	2.00		1.60	0.95	1.30
pile perch	2.00	1.80	2.50	0.85	2.00	1.53		1.20	1.65	1.03
rainbow surfperc	2.00					3.00				
rock wrasse		1.00	1.60	1.87	2.00	1.53		1.80	1.55	1.77
rubberlip seaperch			1.60							
salema		2.00								
sand dab							1.80			
sarcastic fringehead							0.00			
sargo					0.60					
senorita	3.00	1.30	1.80	1.67	3.00	4.00		1.00	3.00	3.00
sheephead			0.70	1.40	2.50	1.17		1.80	1.59	1.12
shiner surfperch	3.00	4.00	0.70	1.50	3.60					1.30
topsmelt		3.00			2.70					
tube-snout	0.80			1.00		2.40				
white surfperch		3.00	1.85	1.90	2.70					
yellowtail							2			

Figure 10. Roving Diver Fish Surveys summarized for all sites surveyed by the Average Fish Abundance Index (0-4, with 4 as the most common and seen earliest in the dive). Details are in text.

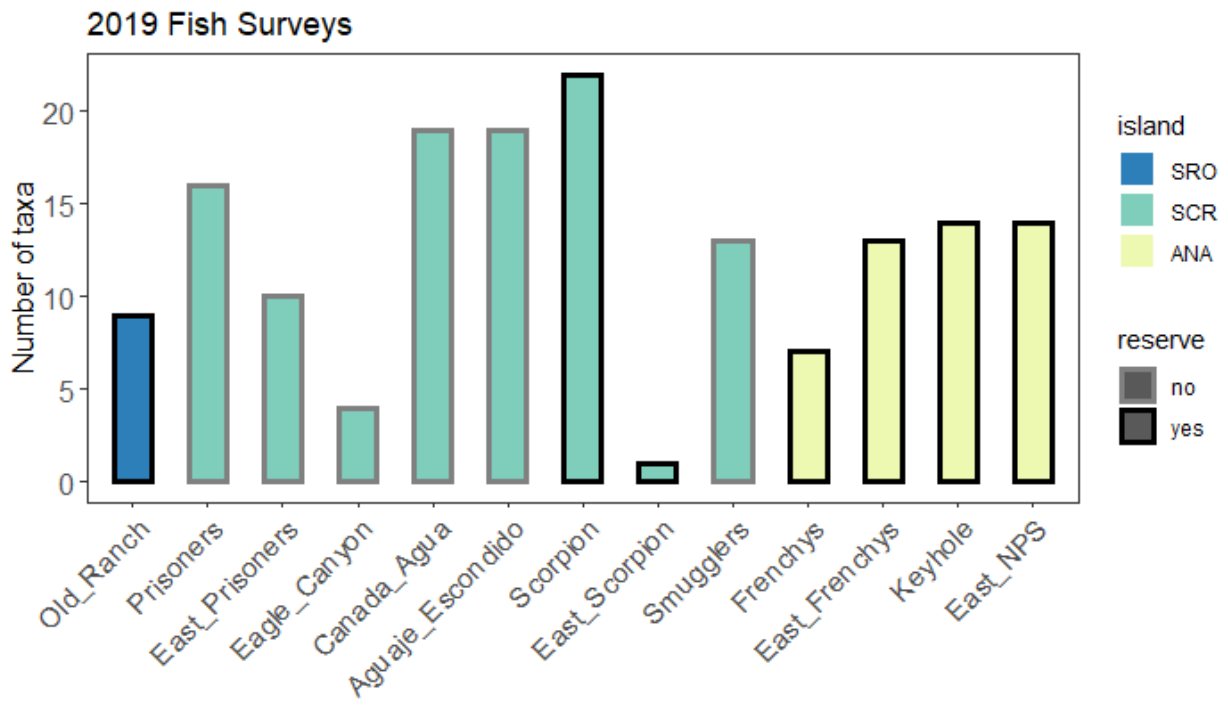


Figure 11. Total Fish Species Richness. Data are for the total number of fish taxa observed at each site (combination of quantitative transects, Roving Diver, and other observations during surveys).

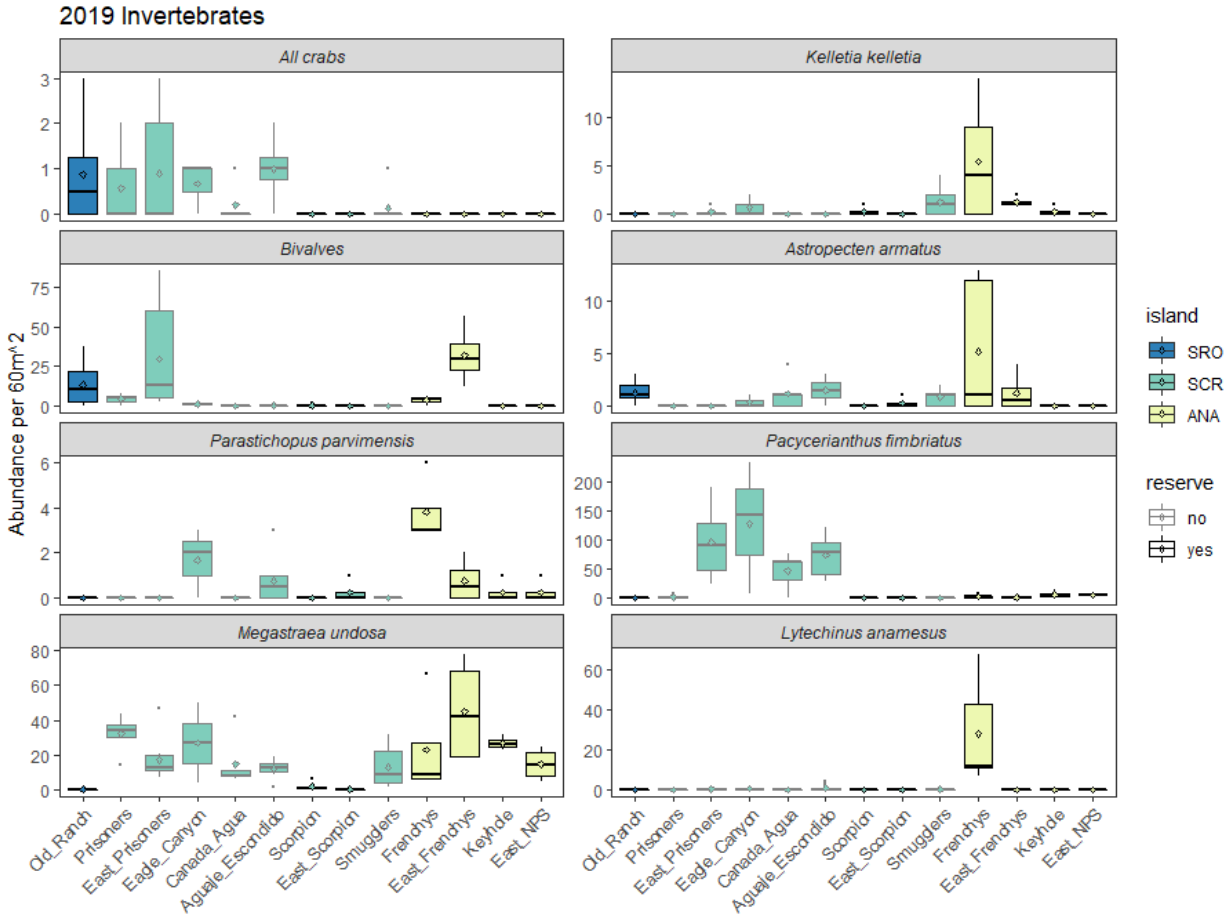


Figure 12. Invertebrate abundance (per 60m^2) across sites for select taxa in 2019. Bars represent average value of (n=3-15) band 60m^2 transects.

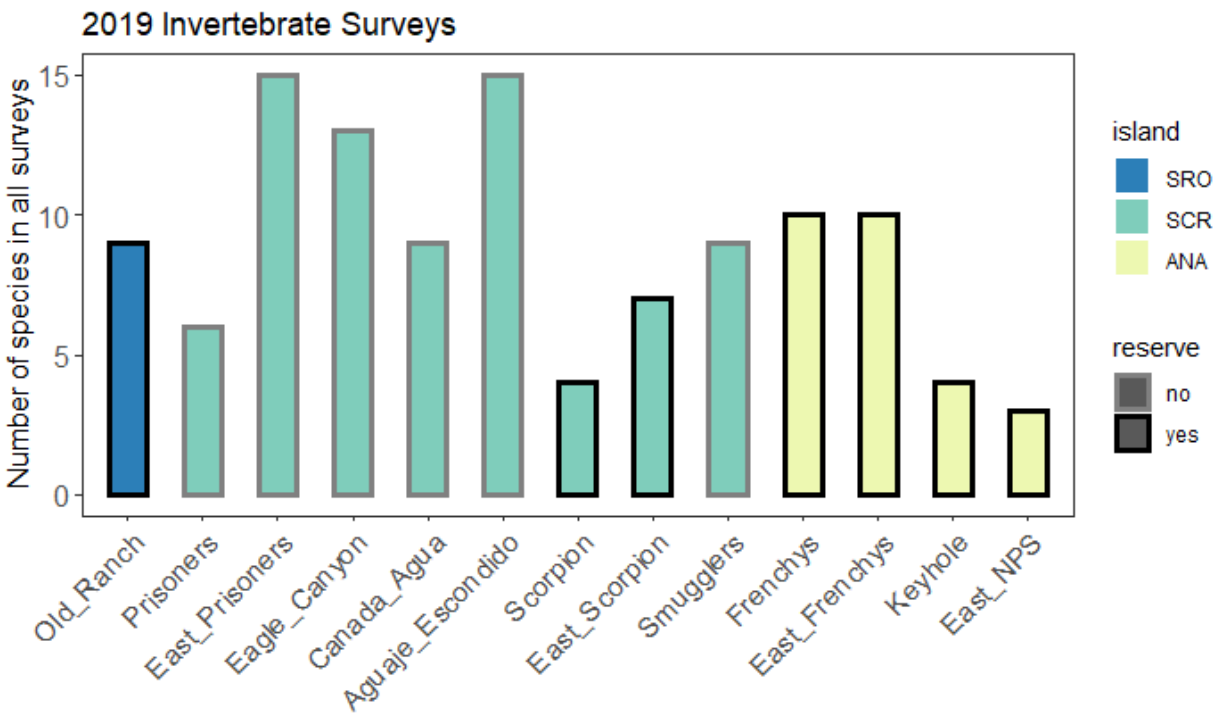


Figure 13. Total Invertebrate Species Richness. Data are for the total number of invertebrate taxa observed at each site along band transects.

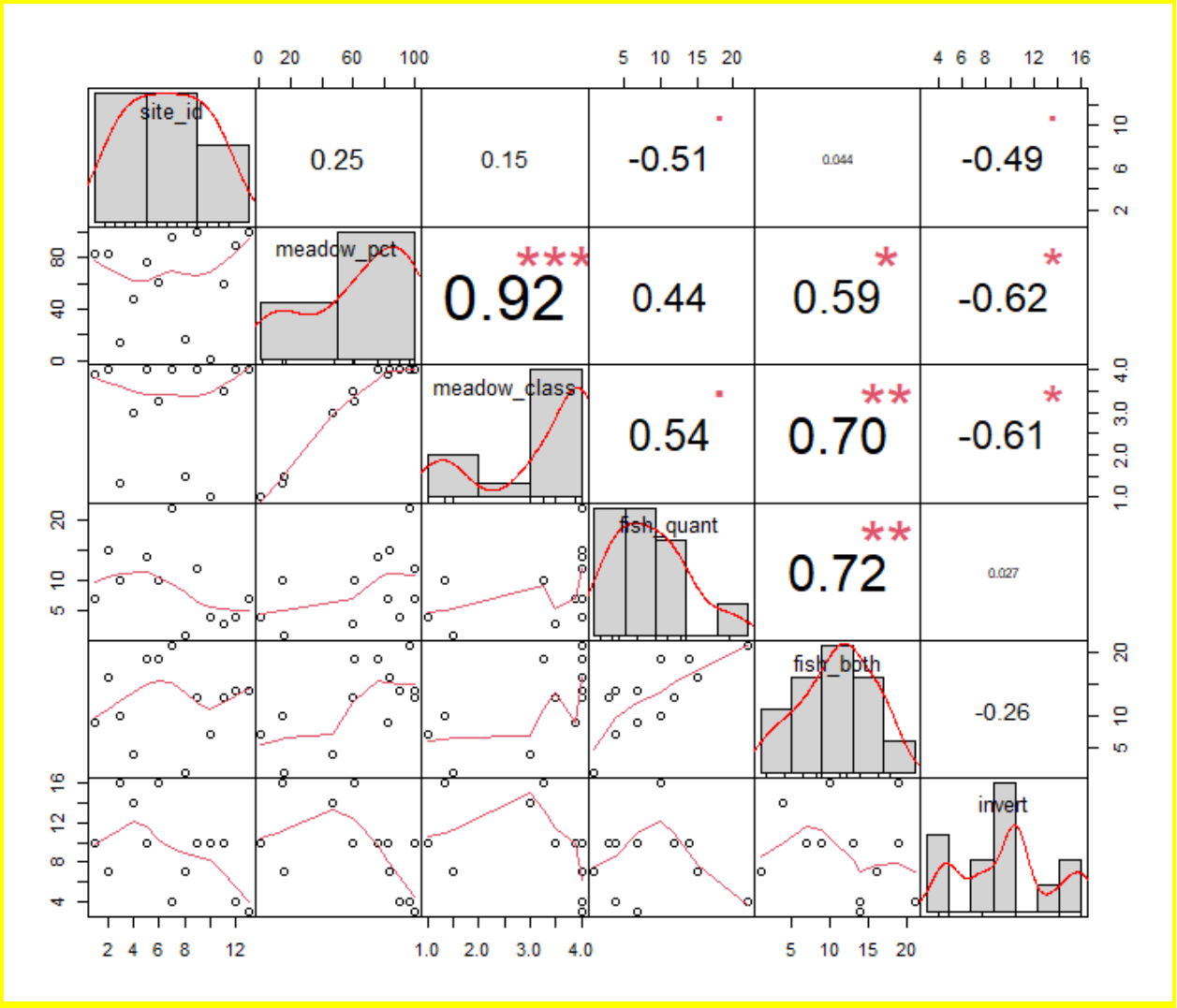


Figure 14. Correlation matrix of meadow extent, fish richness, and invertebrate richness in 2019. Spearman's rank correlation computed due to non-normal distributions and small sample sizes. ***, p<0.001; ** p<0.01; *,p<0.05;• <0.1). Red lines represent smoothing of raw data and histograms. Font size in upper panels relates to correlation strength.

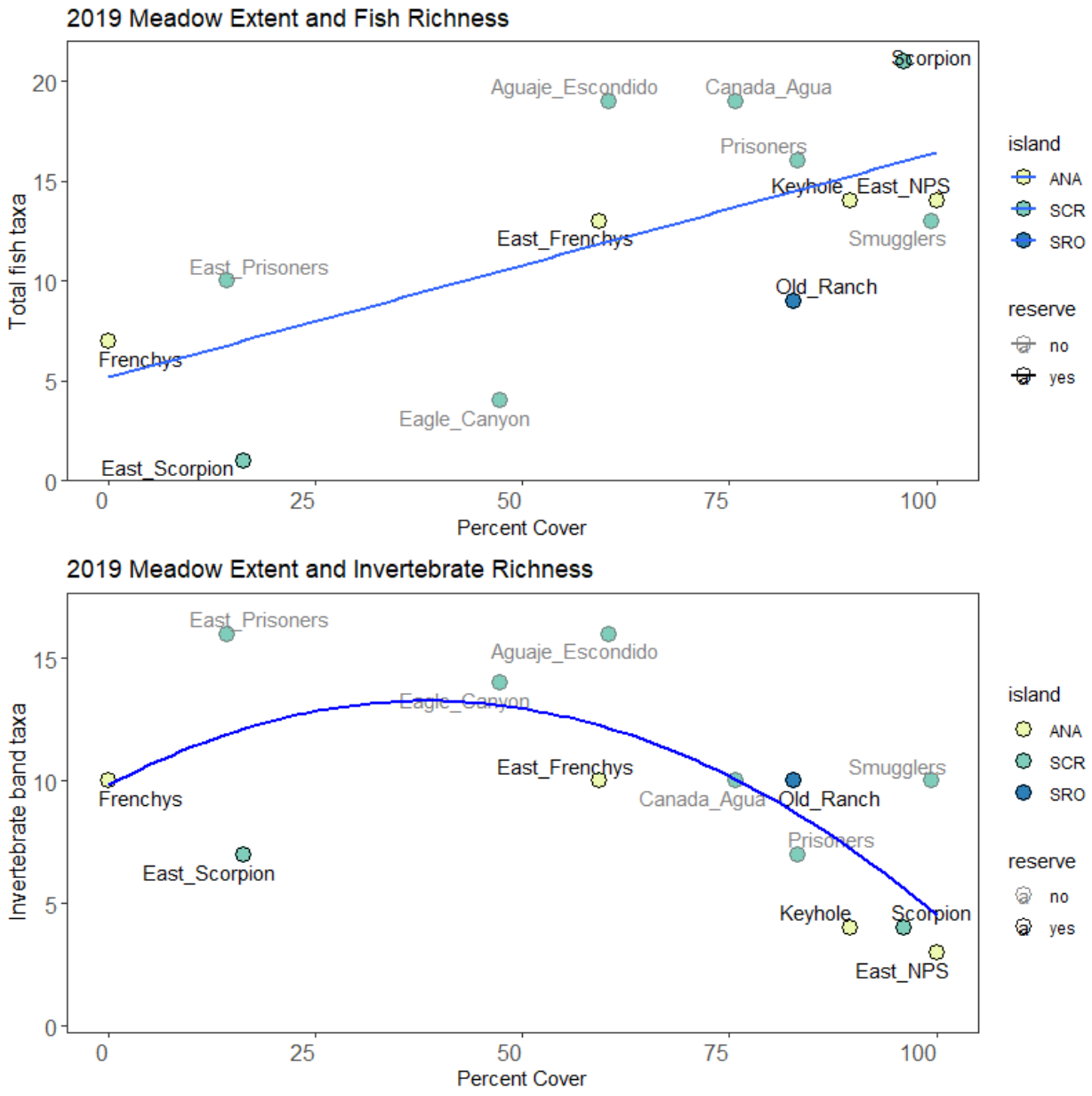


Figure 15. Species richness as a function of eelgrass meadow extent in 2019. Each data point represents averages for each site. Taxa data are total species richness, percent cover data are from point intercept data along transects. Top panel: fish species richness for band and roving diver transects. Line shows fitted linear regression (r^2=0.42, p=0.01). Bottom panel: invertebrate species richness for band transects. Line represents fitted second order polynomial regression (r^2=0.49, p=0.03), which explains more variance than a linear regression (r^2=0.26, p=0.07).

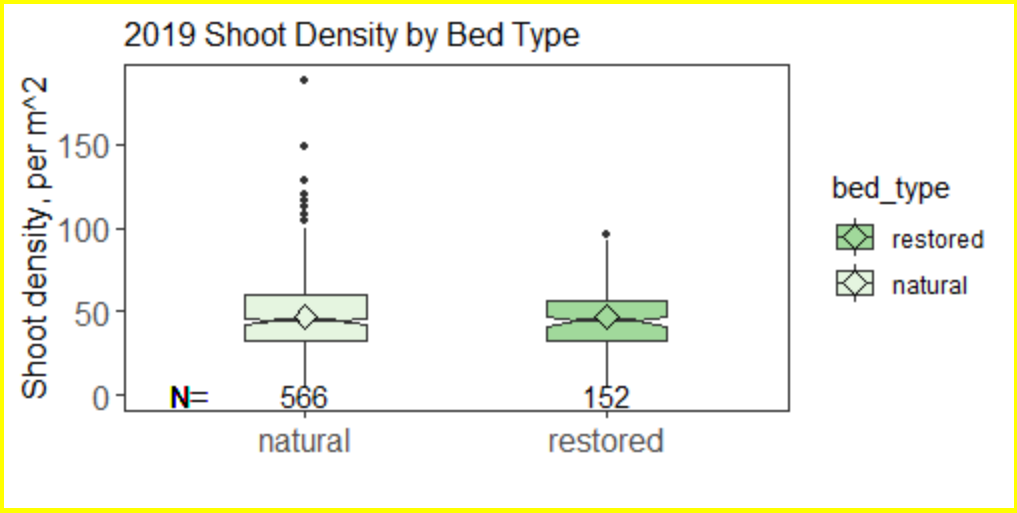


Figure 16. Comparison of shoot density in natural vs restored beds in 2019. Bed types are not significantly different based on overlap of 95% confidence interval around the median.

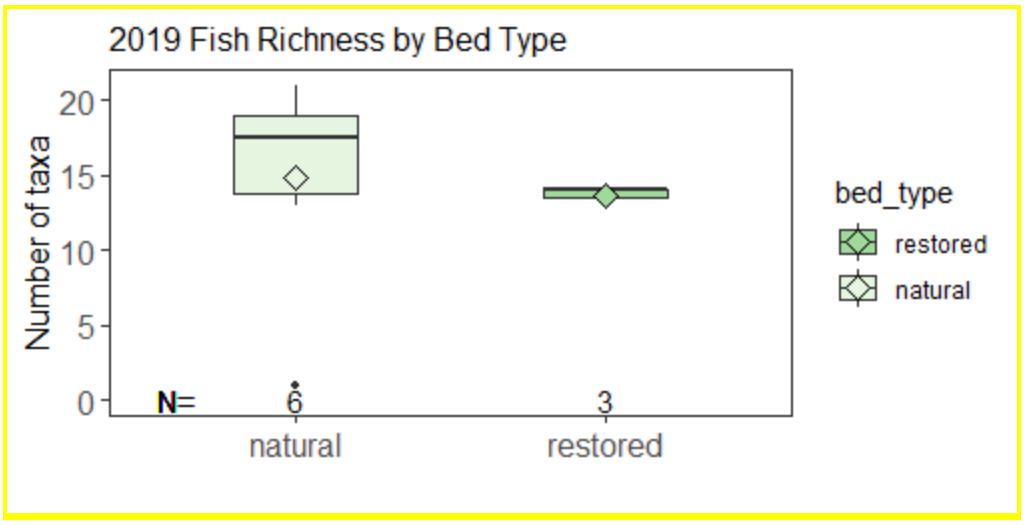


Figure 17. Comparison of fish richness in natural vs restored beds in 2019. Bed types are not significantly different (Kruskal-Wallace test, p=0.54). N is the number of sites in each category. Averages are the same, greater range for natural.

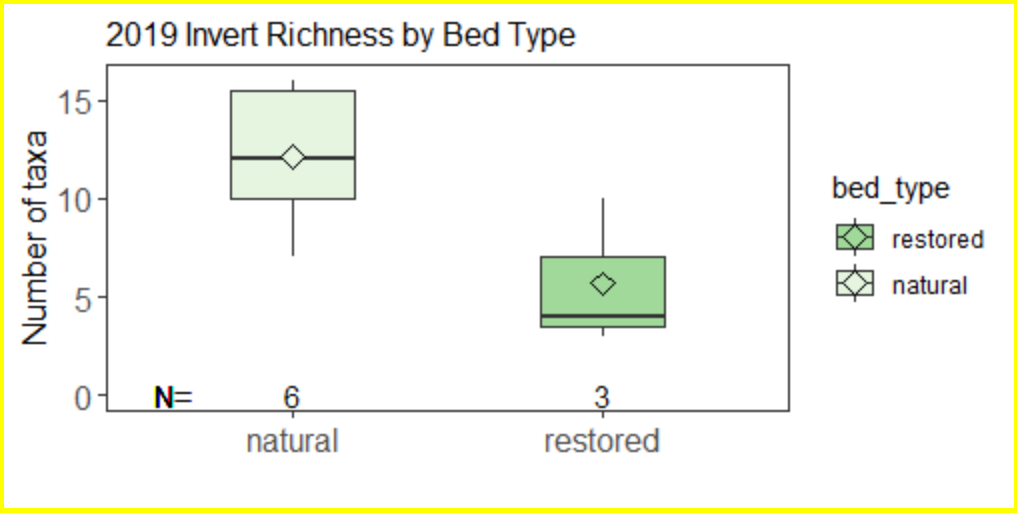


Figure 18. Comparison of invertebrate richness in natural vs restored beds in 2019. Bed types are not significantly different (Kruskal-Wallace test, p=0.40). N is the number of sites in each category.

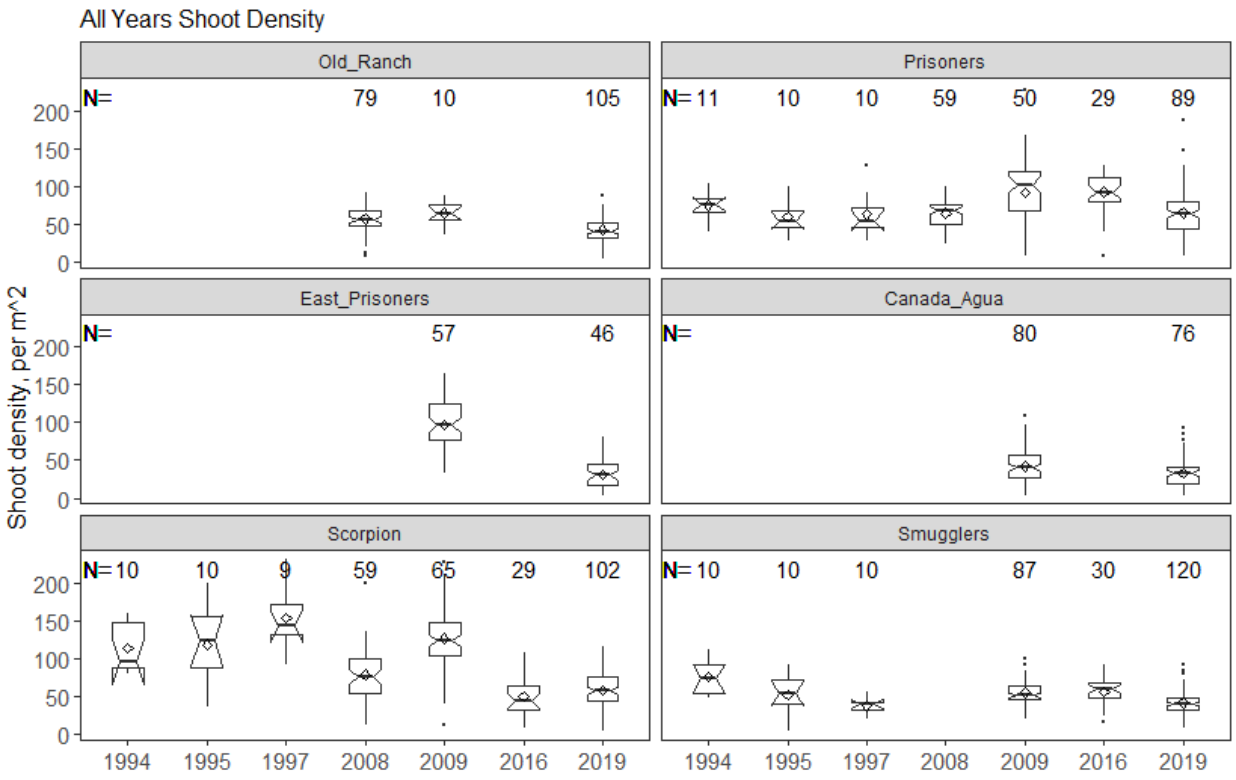


Figure 19. Boxplots of shoot density in quadrats with eelgrass present for sampled years, for select sites. N refers to the number of quadrats with eelgrass per year. For each year: box shows the interquartile range, whiskers represent the upper and lower quartiles, horizontal line represents the median, the diamond marks the mean, dots represent outliers, and notches ascribe the 95% confidence interval of the median.

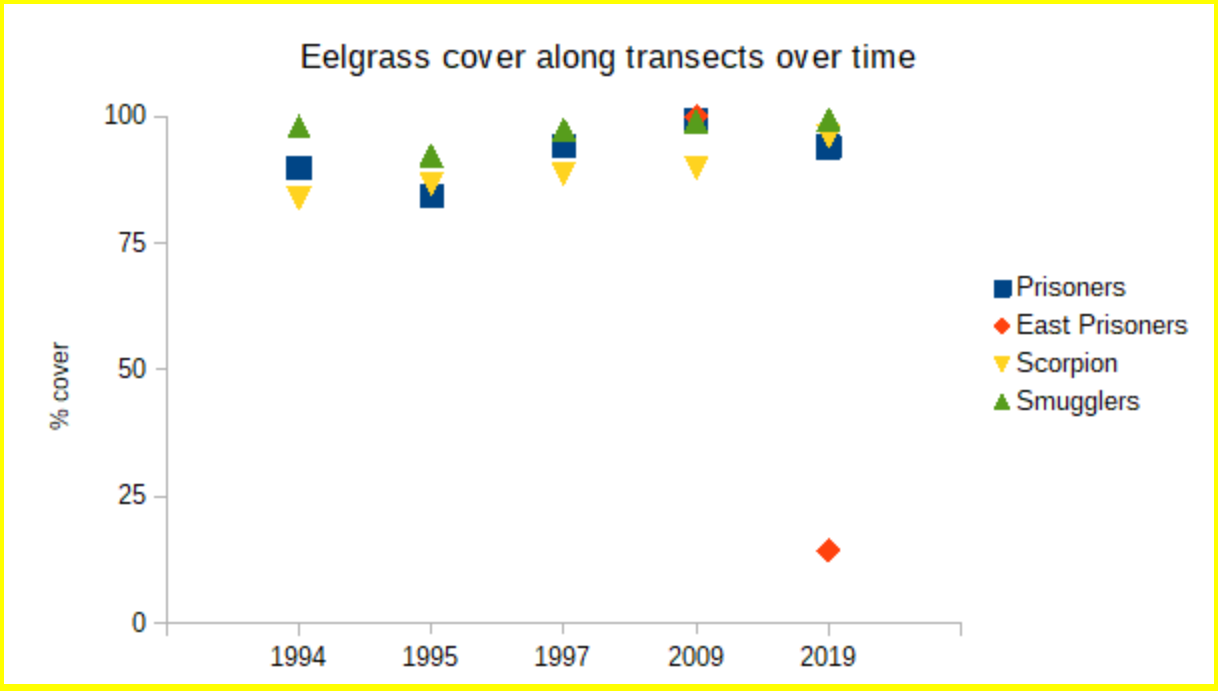


Figure 20. Eelgrass cover along transects at four Santa Cruz Island sites. East Prisoners not sampled in 1994, 1995, and 1997.

Table 1. Channel Islands Eelgrass Meadows 2019 Survey Sites

Site_name	site_id	Island	General Coordinates	Date Surveyed
Old_Ranch	1	SRO	34.96351 -119.97329	20190624
Prisoners	2	SCR	34.02090 -119.68586	20190424, 20190724
East_Prisoners	3	SCR	34.02087 -119.68201	20190424, 20190509
Eagle_Canyon	4	SCR	34.02033 -119.67372	20190509
Canada_Agua	5	SCR	34.01807 -119.66876	20190606, 20190626, 20190724
Aguaje_Escondido	6	SCR	34.01783 -119.64918	20190606, 20190626, 20190724
Scorpion	7	SCR	34.04970 -119.55496	20190514, 20190606, 20190727
East_Scorpion	8	SCR	34.04772 -119.54955	20190514
Smugglers	9	SCR	34.02076 -119.53563	20190625
Frenchys	10	ANA	34.00918 -119.41086	20190523, 20190620
East_Frenchys	11	ANA	34.00763 -119.40873	20190523, 20190620
Keyhole	12	ANA	34.00736 -119.39976	20190524, 20190620
East_NPS	13	ANA	34.00796 -119.39227	20190524, 20190626

Table 2. Channel Islands Eelgrass Meadows 2016 Survey Sites

Site_name	site_id	Island	General Coordinates	Date Surveyed
Prisoners	2	SCR	34.02090 -119.68586	20160808
Scorpion	7	SCR	34.04970 -119.55496	20160808
Smugglers	9	SCR	34.02076 -119.53563	20160808, 20160929
Yellowbanks		SCR		20160808
Frenchys	10	ANA	34.00918 -119.41086	20160624, 20160929*
East_Frenchys	11	ANA	34.00763 -119.40873	20160701, 20160929*
Keyhole	12	ANA	34.00736 -119.39976	20160920*, 20160628*
East_NPS	13	ANA	34.00796 -119.39227	20160920*, 20160628*
Cathedral Cove		ANA		20160920*

Table 4. 2019 fish transect summary data

2019 Fish Band Transects

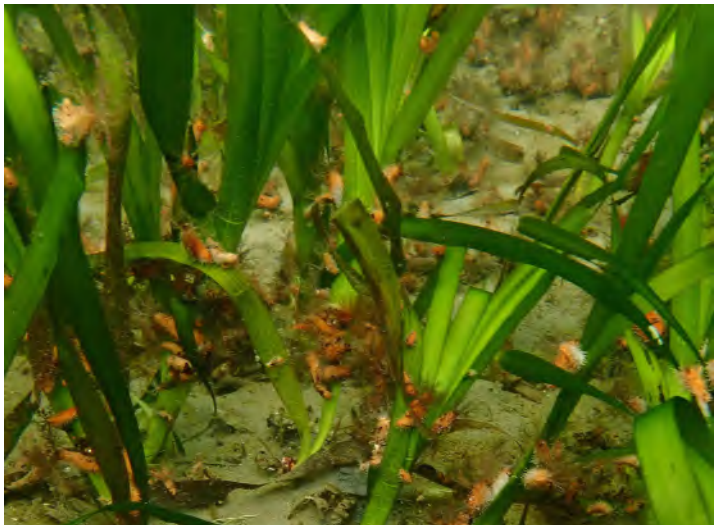
Scientific name	common name	Num Sites Present	Avg Abund	Abundance per 60 m^2													
				Old_Ranch	Prisoners	East_Prisoners	Eagle_Canyon	Canada_Agua	Aguaje_Escondido	Scopion	East_Scorpion	Smugglers	Frenchys	East_Frenchys	Keyhole	East_NPS
Paralabrax clathratus	kelpbass	11	3.2	1.7	2.7	0.4	2.7	5.5	1.3	8.8	0.3	4.5	0.0	0.0	5.7	3.5
Paralabrax clathratus YOY	kelp bass yoy	2	0.1	0.0	0.0	0.1	0.0	0.0	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0
Oxyjulis californica	senorita	7	3.8	22.1	0.9	2.3	0.0	1.4	0.0	4.1	0.0	2.8	0.0	0.0	0.0	2.0
Oxyjulis californica YOY	senorita yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Halichoeres semicinctus	rock wrasse	6	0.3	0.0	0.3	0.0	0.0	0.4	0.2	0.8	0.0	0.1	0.0	0.0	0.0	1.9
Embiotoca jacksoni	black perch	6	0.6	0.1	4.0	0.0	0.0	1.0	0.8	0.8	0.0	0.3	0.0	0.0	0.0	0.0
Embiotoca jacksoni YOY	black perch yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhacochilus vacca	pile perch	6	0.3	0.1	0.7	0.0	0.0	0.0	0.3	0.7	0.0	0.6	0.0	0.0	0.0	0.1
Rhacochilus vacca YOY	pile perch yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Hypsurus caryi	rainbow perch	2	0.1	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0
Hypsurus caryi YOY	rainbow perch yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhacochilus toxotes	rubberlip perch	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0
Cymatogaster aggregata	shiner perch	2	1.1	1.5	10.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Phanerodon furcatus	white perch	5	1.0	0.0	6.1	0.6	0.0	0.3	0.0	4.3	0.0	0.1	0.0	0.0	0.0	0.0
Phanerodon furcatus	white perch yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sebastes sp. YOY	yoy rockfish UNID	1	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Myliobatis californica	bat ray	4	0.1	0.3	0.0	0.1	0.0	0.1	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0
Girella nigricans	opaleye	3	0.2	0.0	0.1	0.0	0.0	0.0	0.0	1.6	0.0	0.2	0.0	0.0	0.0	0.0
Semicossyphus pulcher	sheephead F	7	0.1	0.0	0.1	0.0	0.2	0.0	0.1	0.6	0.0	0.2	0.0	0.0	0.3	0.1
Semicossyphus pulcher	sheephead M	2	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0
Semicossyphus pulcher	sheephead all	8	0.2	0.0	0.1	0.0	0.2	0.1	0.1	0.9	0.0	0.2	0.0	0.0	0.3	0.1
Heterostichus rostratus	giant kelpfish	5	0.1	0.0	0.1	0.0	0.0	0.2	0.1	0.2	0.0	0.1	0.0	0.0	0.0	0.0
Heterostichus rostratus	YOY giant kelpfish	6	1.6	0.0	7.5	0.4	0.0	2.8	0.3	0.0	0.0	1.0	0.0	11.7	0.0	0.0
Aulorhynchus flavidus	tubesnout	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhinogobiops nicholsii	black eye goby	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0
Rhinogobiops nicholsii	black eye goby yoy	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0
Chaenopsis alepidota	Orange-throat	3	0.1	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2	0.0	0.0
Medialuna californiensis	halfmoon	4	0.1	0.0	0.0	0.0	0.0	0.1	0.0	0.7	0.0	0.0	0.0	0.0	0.1	0.1
Paralichthys californicus	halibut	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1
Synodus lucioceps	lizardfish	1	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
flatfish unid	flatfish unid	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0
Trachurus symmetricus	jack mackerel	2	2.2	0.0	0.0	0.0	0.0	15.4	0.0	7.1	0.0	0.0	0.0	0.0	0.0	0.0
Atherinops affinis	top smelt	3	1.4	0.0	6.4	0.0	0.0	5.8	0.0	3.6	0.0	0.0	0.0	0.0	0.0	0.0
Sphyraena argentea	barracuda	3	1.3	0.0	0.0	2.2	0.0	1.5	0.0	8.2	0.0	0.0	0.0	0.0	0.0	0.0
Atractoscion nobilis	white seabass	1	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Anisotremus davidsonii	Sargo	1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0
Caulolatilus princeps	ocean whitefish	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Triakis semifasciata	leopard shark	3	0.0	0.0	0.2	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Scorpaena guttata	CA scorpionfish	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Heterodontus francisci	Hornshark	3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2	0.0	0.0	0.0	0.2	0.0	0.0
Leiocottus hirundo	lavender sculpin	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Pleuronichthys coenosus	CO turbot	1	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Citharichthys stigmaeus	sanddab	3	0.1	0.0	0.0	0.3	0.2	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0
Gymnothorax mordax	moray eel	1	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Neoclinus blanchardi	sarcastic fringehead	1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0
Sebastes rastrelliger	grass rockfish	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Brachyistius frenatus	kelp perch	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Hyperprosopon argenteum	walleye perch	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Embiotoca lateralis	striped perch	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sebastes serranoides YOY	olive rockfish yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Squatina californica	angel shark	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Scorpaenichthys	cabezon	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sardinops sagax	sardines	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sebastes serranoides	olive rockfish	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sebastes paucispinis YOY	boccacio yoy	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Table 5. 2019 Invertebrate summary data.

Table. Invertebrate abundance in 2019 surveyes.

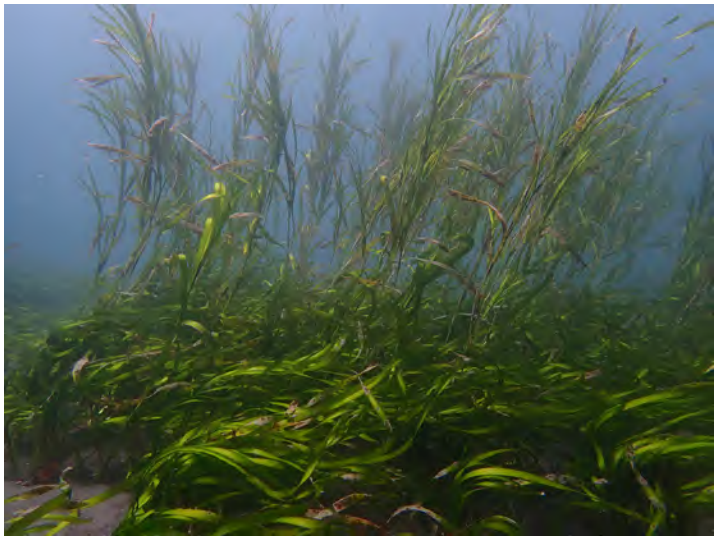
				Abundance per 60 m^2												
Scientific name	common name	Num Sites Present	Avg Abund	Old_Ranch	Prisoners	East_Prisoners	Eagle_Canyon	Canada_Agua	Aguaje_Escondido	Scorpion	East_Scorpion	Smugglers	Frenchys	East_Frenchys	Keyhole	East_NPS
Anthopluera sola	solitary anemone	1	0.002	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pacycerianthus fimbriatus	tube_anemone	11	7.236	0.1	2.0	96.1	128	47	74	0.0	0.3	0.0	2.4	1.0	5.5	5.0
Renilla koellikeri	sea_pansy	5	0.152	0.0	0.0	0.0	2.7	0.2	2.5	0.0	1.8	0.5	0.0	0.0	0.0	0.0
Phyllactis sp	sand_anemone	2	0.023	0.0	0.0	0.0	0.7	0.0	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Stylatula elongata	sea_pen	6	0.073	0.0	0.0	0.0	1.0	0.2	0.6	0.0	0.3	0.4	1.2	0.0	0.0	0.0
Eudistyla sp	feather duster worm	1	0.003	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Bivalves	misc_bivalves	8	1.652	13.4	2.6	29.7	1.0	0.0	0.1	0.3	0.0	0.0	3.6	32.0	0.0	0.0
Megastraea undosa	wavy_turban_snail	13	4.570	0.1	32.3	17.3	27.0	15.0	12.3	1.8	0.3	13.0	23.0	45.0	26.8	14.8
Aplysia californica	sea_hare	3	0.022	0.0	0.0	0.0	0.0	0.2	0.3	0.0	0.0	0.6	0.0	0.0	0.0	0.0
Kelletia kelletia	kellet_whelk	7	0.186	0.0	0.0	0.2	0.7	0.0	0.0	0.3	0.0	1.3	5.4	1.3	0.3	0.0
Bula/Haminoea	bubble_snail	1	0.284	0.0	0.0	14.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Neverita lewisii	moon_snail	3	0.015	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.0	0.0
Pluerobranchus sp	Pluerobranchus sp	1	0.020	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Navanax inermis	Navanax inermis	4	0.063	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.3	0.0	1.0	1.0	0.0	0.0
Rixtaxis	snail	1	0.033	0.0	0.0	0.0	1.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Octopus sp	octopus	1	0.005	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0
Norrisia norrisii	kelp_snail	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Conus californicus	cone_snail	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Crossata californica	California frog shell	1	0.003	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0
other_snail	other_snail	1	0.004	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Loxorhynchos grandis	sheep_crab	2	0.005	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Cancer sp.	cancer_crab	3	0.020	0.5	0.1	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Portunus xantusii	swimming_crab	1	0.002	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pagurus/Paguristes	hermit_crab	6	0.042	0.0	0.3	0.8	0.3	0.2	0.4	0.0	0.0	0.1	0.0	0.0	0.0	0.0
Pugettia/Taliepus	kelp_crab	2	0.005	0.1	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Heterocrypta occidentalis	elbow_crab	1	0.008	0.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Cancer gracilis	slender_crab	1	0.005	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Panulirus interruptus	lobster	1	0.004	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Randallia ornata	globe_crab	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
unid crab	other_crab	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
all_crabs	all_crabs	7	0.087	0.9	0.6	0.9	0.7	0.2	1.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0
Phoronida	phoronid	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Parastichopus parvimensis	sea_cucumber	7	0.154	0.0	0.0	0.0	1.7	0.0	0.8	0.0	0.3	0.0	3.8	0.8	0.3	0.3
Astropecten armatus	sand_star	8	0.237	1.3	0.0	0.0	0.3	1.2	1.5	0.0	0.3	0.9	5.2	1.3	0.0	0.0
Pisaster sp.	giant-spined sea star	1	0.005	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0
Dendraster excentricus	sand dollar	1	0.009	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Arbacia stellata	Arbacia urchin	1	0.004	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Lytechinus anamesus	white_urchin	5	0.608	0.0	0.0	0.6	0.7	0.0	0.9	0.0	0.0	0.1	28.2	0.0	0.0	0.0
Strongylocentrotus franciscanus	red_urchin	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Strongylocentrotus purpuratus	purple_urchin	1	0.002	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Patiria miniata	bat_star	3	0.039	1.5	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.0	0.2	0.0	0.0	0.0
unidentified cucumber	unidentified cucumber	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Luidia foliolata	deep sand star	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pycnopodia	sunflower_star	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pachythione rubra	small red cucumber	0	0.000	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Anthropogenic disturbances to eelgrass. CW from UL: Mooring anchor and chain in 2016 and 2019 (Scorpion SCR); small vessel anchor (East NPS ANA); debris from land (Scorpion SCR); fishing gear (Frenchys ANA); sunken vessel (Keyhole ANA).

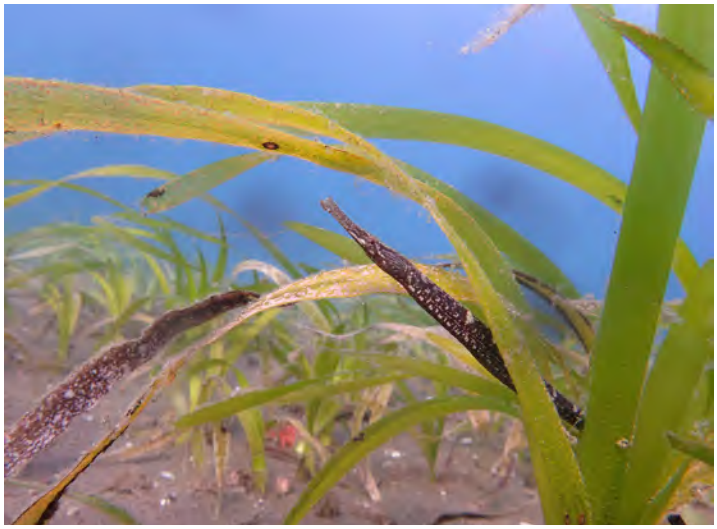


Natural disturbances to eelgrass meadows. CW from UL: Bat ray feeding pits (Scorpion SCR); urchin grazing (Eagle Canyon SCR); wavy turban snail grazing (Smugglers SCR); invertebrate mobbing (*Pachythione rubra* Old Ranch SRO); sea hare mass spawning (Aguaje Escondido SCR); disease (East Frenchys ANA).

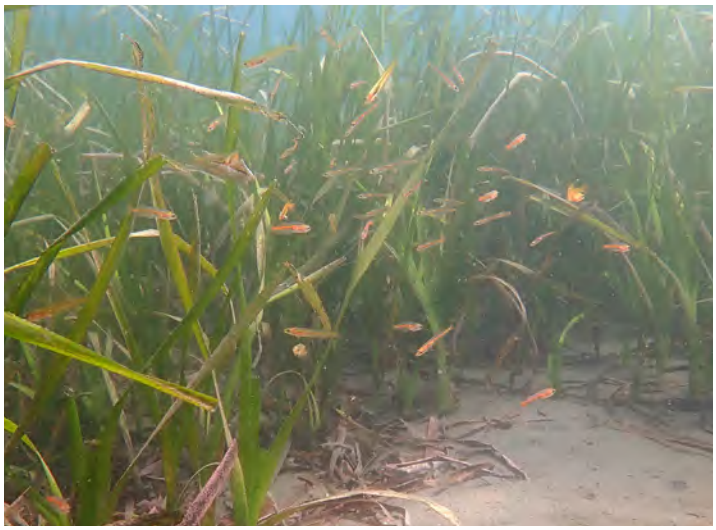
Major invertebrates found in eelgrass beds. CW from UL: Sea cucumber (Prisoners SCR); Cancer crabs (Prisoners SCR); sand star (East Frenchys ANA); lobster (Frenchys ANA); sand tube anemone (Canada Agua SCR); clam (Aguaje Escondido SCR).



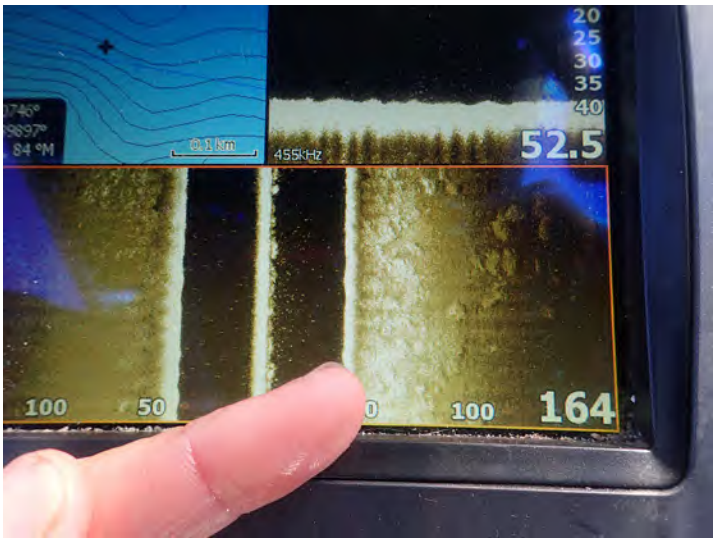
Reproductive phases in *Zostera pacifica*. CW from UL: New reproductive shoots developing in late spring (Keyhole ANA; and at East Frenchys ANA); close-up of an open spathe with male flowers (Prisoners SCR); ripening seeds (Aguaje Escondido SCR); a seedling (Canada Agua SCR); senescing reproductive shoot in late July (Prisoners SCR).

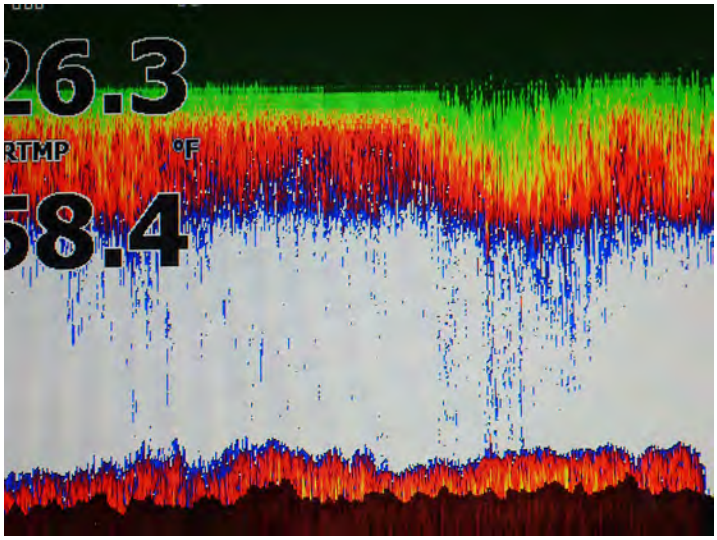


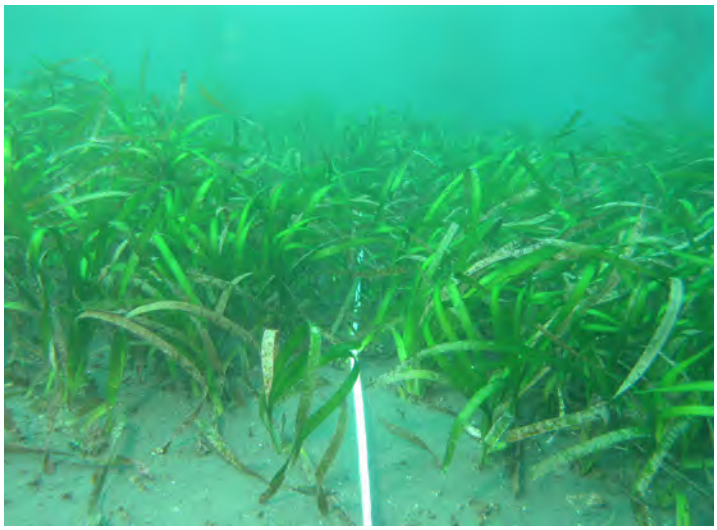
Common fishes in eelgrass. CW from UL: White and pile perch (Scorpion SCR); rainbow and black perch (Smugglers SCR); sheephead (Scorpion SCR); bay pipefish (East Frenchys ANA); kelp bass (Keyhole ANA); halibut (East NPS ANA).

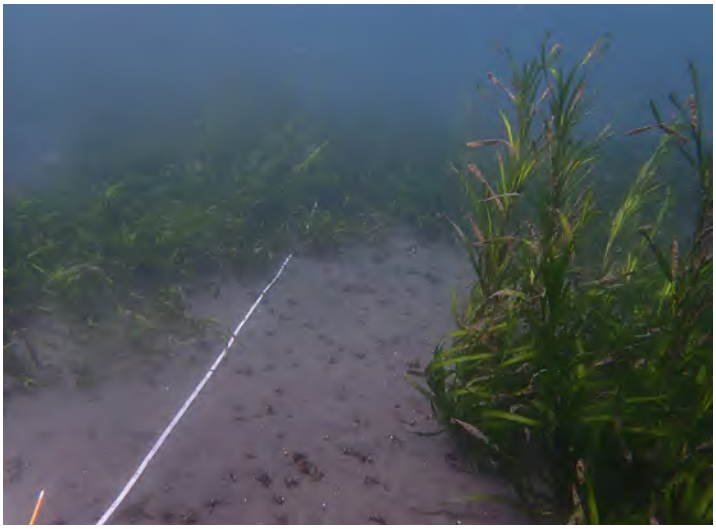


Fish reproductive use of eelgrass meadows. CW from UL: Black perch exhibiting courtship behavior; juvenile horn shark (both East Frenchys ANA); young of the year (YOY) giant kelpfish (Canada Agua SCR); gravid shiner perch (Scorpion SCR); topsmelt eggs on eelgrass (Frenchys ANA) kelp bass YOY recruit (Frenchys ANA).





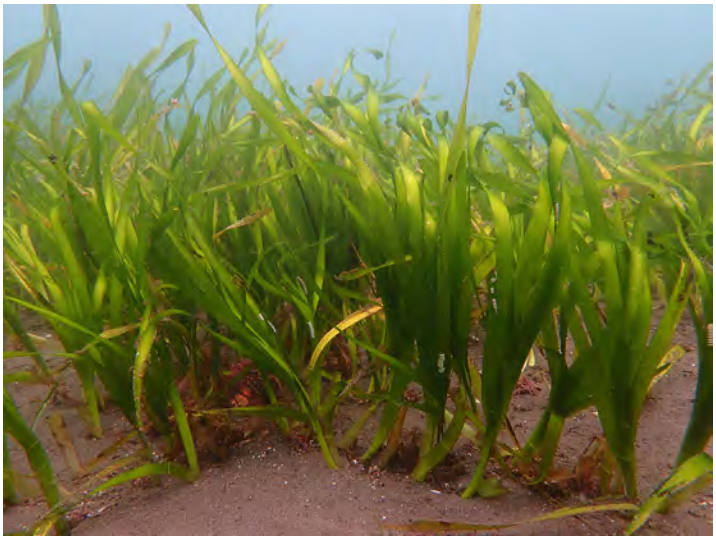
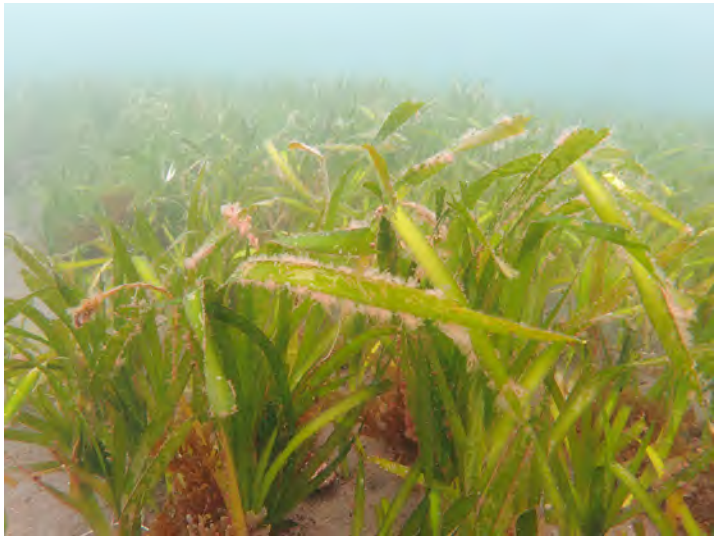
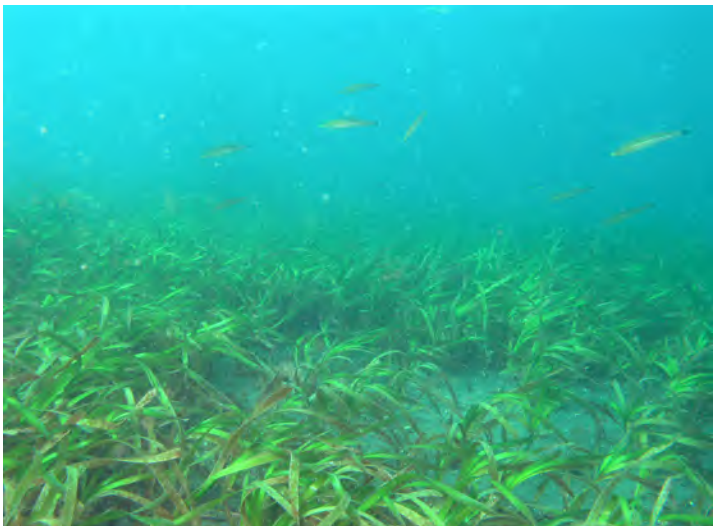
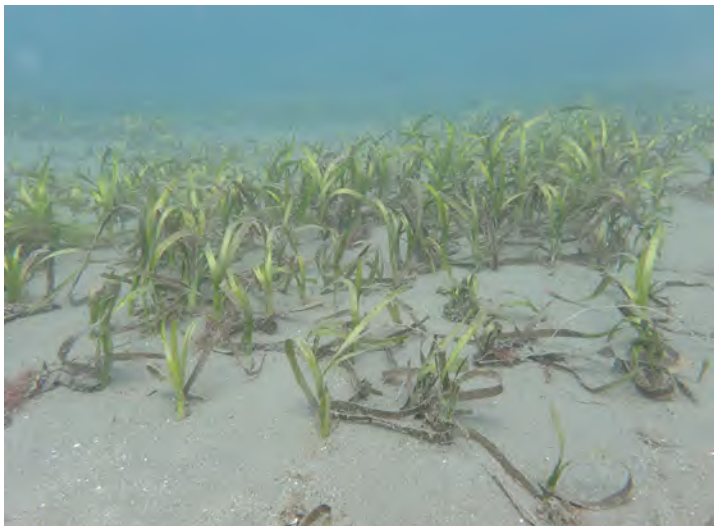
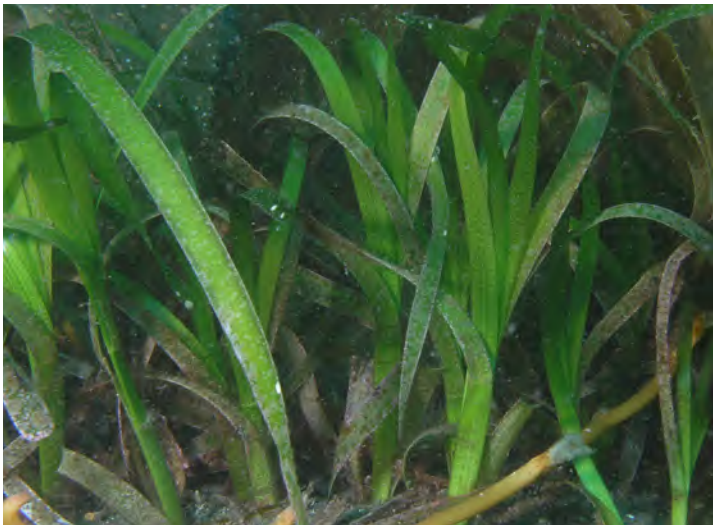




Mapping and quantifying eelgrass meadows. CW from UL: Eelgrass along Middle Anacapa imaged on ship's sounder (2016); imaged on fish finder (2019); Frenchys restoration transect within MCA (2006); and same restoration transect in 2019; control transect at East Frenchys within MPA (2019); diver mapping patch along same control transect in 2009.

Interesting observations during 2016 and 2019 surveys. CW from UL: Giant sea bass (2019 East Frenchys ANA); moray eel (2019 Prisoners SCR); sea sweet potato (2016 Prisoners SCR), pelagic red crab (2016 East Frenchys ANA); juvenile white seabass (2019 Prisoners SCR); black sea hare (2016 East Frenchys ANA, the largest of all sea slug species).

Commercial trapping at Frenchys. Top row: Lobster floats November 2016 on the MPA/MCA bounday (left) and in the MCA (right); Middle row: November 2019 on the MPA/MCA boundary, facing north (left), December 2020 looking south in to the cove along the boundary , > 2 dozen visible (right); Bottom row: abandoned trap within MPA September 2016 (left); abandoned trap on the restoration transect (diver touching marker stake) in MCA September 2016.

Physiological stress in eelgrass following warm-water events, compared to cooler years. Top row L and R: Eelgrass in late June 2019 (cooler) and late June 2016, el Nino (both East Frenchys ANA); Center and bottom rows: left, mid- September 2007 (cold) and right, 2016, el Nino (both at East Frenchys ANA).

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: Anacap SMCA at Anacapa Island</u>

Dear President Sklar and Honorable Commissioners:

The undersigned organizations have decades of combined experience and interest working on Marine Protected Area ("MPA") management, research, compliance, outreach, and education efforts. We submit this letter to support the submission of an MPA petition for the Anacapa State Marine Conservation Area ("SMCA") as a part of the Decadal Management Review ("DMR") process. This petition seeks to reclassify the Anacapa SMCA as a State Marine Reserve ("SMR") or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.

The DMR is a momentous step in adaptive and community-based conservation. We commend the California Fish and Game Commission, California Department of Fish and Wildlife, and California Ocean Protection Council for the enormous effort undertaken to

complete this first 10-year review. The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems. Eelgrass meadows are one of the may habitats protected by MPAs. The eelgrass found in California and at Anacapa Island is *Zostera marina.* This subspecies of eelgrass used to be abundant at multiple sites at Anacapa island until white urchin (*Lytechinus anemesus)* populations increased and invaded the area following the 1983 El Nino. Transplantation efforts at Anacapa Island have had some success, however the shift of spiny lobster trapping to soft bottom habitat has led to a decline in the transplanted eelgrass population at Frenchy's Cove.

Anacapa Island Historic Eelgrass Cover

Eelgrass plays an important role in many marine systems like species survival, reducing coastal erosion, acting as a carbon sink, etc. Globally eelgrass populations have declined during the past 25 years through a combination of natural and anthropogenic deterioration. By 1995, only 2 small eelgrass patches were present at East Anacapa Island, and both disappeared by 1999. Past research at Anacapa Island found that there had been no sign of recruitment at Frenchy's Cove since 1991 up until the 2000s when efforts were made to reintroduce eelgrass into the area. The annual surveys conducted from 1991 to 2001 at Frenchy's Cove revealed no eelgrass seedlings, adult plants, or drift material, underlining the limited long-distance dispersal capabilities of this species.

Impacts to Anacapa SMCA Eelgrass Meadows

Follow up surveys in 2014 and 2016, after the transplantation effort in the early 2000s, found the transplanted eelgrass meadows at the Anacapa SMCA to be damaged and greatly reduced. Information gained from mariners and National Park rangers revealed that Frenchy's Cove was being fished heavily during the two months (November, December) that the brown pelican Special Closure was open. Fishing block data for the mainland showed that effort more than doubled within blocks containing fishing areas adjacent to SMRs. Notably, eelgrass continues to thrive within the Anacapa SMR, 200 meters to the east.

Before the shift in fishing efforts for spiny lobster, in 2012 the research team responsible for the transplantation in the early 2000s found additional patches 200 meters to the east of the transplant site and scattered shoots were observed at the west end of East Anacapa Island. The unintended differences in usage of the SMCA and SMR showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (i.e., trapping) were to cease.

The impact of fishing for spiny lobster during the two months allowed is destroying the eelgrass meadows. Research shows that recruitment of new eelgrass is a long process, but it is possible when the ideal habitat is left undisturbed. Currently the SMCA allows for recreational take of spiny lobster and pelagic finfish and commercial take of spiny lobster. The Brown Pelican special closure allows for lobster traps in November and December. We ask that the SMCA be reclassified as a SMR or reclassifying the portion of the SMCA from shore to at least 30 meters depth.

Conclusion

We celebrate the success of the MPA network in a time when ocean conservation wins are more important than ever. While we rely on oceans to contribute to many of our societal needs, from food to energy, we must remain committed to protection of our shared resources, not only for future generations but also for the intrinsic value of a thriving ocean. This petition to reclassify the Anacapa SMCA as an SMR or reclassifying the portion of the SMCA from shore to at least 30 meters depth will allow Anacapa Island to recover its historic eelgrass meadow.

Thank you for your consideration of the MPA petition. If you have any questions, please contact Azsha Hudson, ahudson@environmentaldefensecenter.org.

Sincerely,

Azsha Hudson, Marine Conservation Analyst
Environmental Defense Center

Richard Smalldon, Director
Santa Barbara Museum of Natural History, Sea Center

Robert Mazurek, Executive Director
California Marine Sanctuary Foundation

Tomas Valadez, California Policy Associate
Azul

Elizabeth Purcell, Policy and Communications Intern
Turtle Island Restoration Network

Ted Morton, Executive Director
Santa Barbara Channel Keeper

Jim Taylor, Group Chair
Sierra Club, Santa Barbara – Ventura

Robert Vergara, Roger Arliner Young (RAY) Ocean Conservation Fellow
Natural Resources Defense Council

Ashley Eagle-Gibbs, Interim Executive Director & Legal and Policy Director
Environmental Action Committee of West Marin (EAC)

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-27MPA_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.

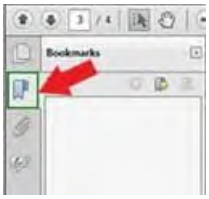
Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in 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

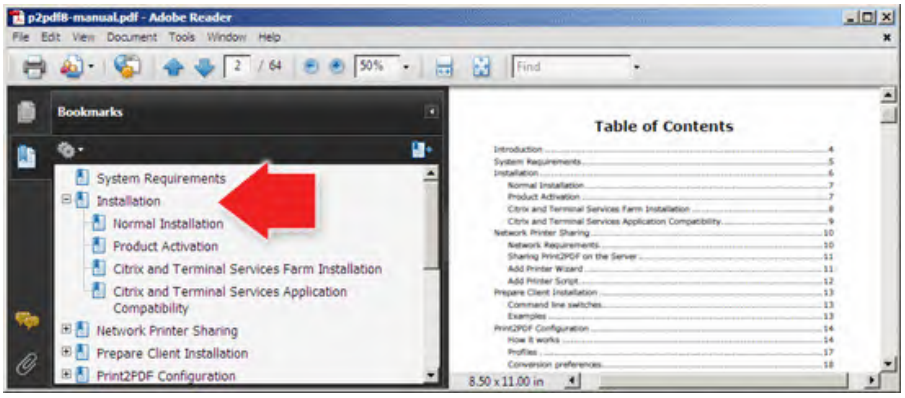
EASY GUIDE TO USING THE PACKET

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.



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: 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 6, 2024

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

Re: <u>Comments on Fish and Game Commission February 14-15 Meeting Agenda Item 10(B)</u>

Dear President Sklar and Honorable Commissioners:

On behalf of the Environmental Defense Center ("EDC"), please consider our comments on the Marine Protected Area ("MPA") Network, MPA Petition process. California's MPA Network has advanced ocean conservation in a manner worthy of global recognition. The MPA Network's success boasts ten years of research and monitoring activities that indicate MPAs are positively contributing to the six goals of the Marine Life Protection Act ("MLPA"). Even with these positive results, the Network has yet to realize its full potential in ocean protection. We appreciate the opportunity to stay involved with this process and submit this letter to urge Commissioners and staff to only consider actions to improve and strengthen protections and to reject petitions that do not align with the guidance from the MLPA. We also encourage the approval of Petition 2023-27MPA, to reclassify Anacapa State Marine Conservation Area ("SMCA") into a State Marine Reserve ("SMR") or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.

Marine Life Protection Act Guidance

The establishment of the MPA network was comprised of lengthy stakeholder conversation to gather information from all ocean users. The MPA Network now reflects the work that occurred in just under a decade, showcasing extensive political compromise and a comprehensive design that allows for a wide range of consumptive and non-consumptive use. The six MLPA goals guided the initial process and should still be an impartial directive today.

The first goal in the MLPA states, "Protect the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems." Ca. Fish and Game Code § 2853(b)(1). As this goal states, the function of an MPA is to facilitate the recovery and growth of the ecosystem that is contained within its borders. MPA Petitions requesting a decrease in protections to allow for take of a species do not fit within the guidance from the MLPA. MPAs were not imagined and built to operate as a fishery management plan, with evaluations every year for one species. They were designed to take a comprehensive look at whole ecosystems in need of protection to be evaluated every decade to allow for the ecosystem and its inhabitants to grow healthy again.

As the state considers adaptive management of the MPA network, it is important to make decisions that support MLPA goal 5 which requires that "effective management measures and adequate enforcement and are based on sound scientific guidelines." Ca. Fish and Game Code § 2853(b)(5). Allowing SMRs to be downgraded as SMCAs in order to allow commercial and/or recreational take will create complexity for enforcement officers who must ensure individual compliance with regulations. Petition requests to allow take of certain species like highly migratory species or those with weak site fidelity does not allow for ease of enforcement. Those species that are largely migratory will not stay in any one MPA long term; therefore, allowing any take of these species in highly protected MPAs does not support scientifically sound adaptive management and will establish a precedent for weaking MPA protections. Prohibiting these fishing pressures will support enhanced enforcement and align with recently available scientific findings.

Anacapa Island SMCA should be Reclassified to a SMR

The Decadal Management Review ("DMR") is a momentous step in adaptive and community-based conservation. We commend the California Fish and Game Commission ("FGC"), California Department of Fish and Wildlife, and California Ocean Protection Council for the enormous effort undertaken to complete this first 10-year review. The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems.

This petition supports goals 1, 2, 3, and 5 of the MLPA as it will remove a significant and specific threat to eelgrass – recreational and commercial lobster fishing, sustain and protect both eelgrass and the marine species that utilize the habitat, eelgrass beds are a critical study area to understand how to restore other eelgrass meadows in California waters, and will support "effective management measures, and adequate enforcement, and are based on sound scientific guidelines." Ca. Fish and Game Code § 2853(b)(1), (2), (3), and (5).

This petition protects the eelgrass habitat that provides significant ecosystem services in shallow, sandy-bottom habitats. Eelgrass beds support complex food webs, filter nutrients, and improve water quality, stabilize sediments, and serve as important refuge and nurseries for marine vertebrates and invertebrates. Eelgrass beds are typically found from shallow waters down to depths of up to 30 meters (98 feet). Due to their habitat range we submitted an alternative request of partial reclassification from shore to 30 meters.

By approving the conversion of the Anacapa SMCA to a SMR, the FGC will integrate the best available science into MPA policy; support the goals of the MLPA; advance federal and state policies advocating for the recovery and protection of eelgrass; and directly support the DMR's goal of adaptively managing MPAs based on findings from the past decade.

Conclusion

We celebrate the success of the MPA network in a time when ocean conservation wins are more important than ever. While we rely on oceans to contribute to many of our societal needs, from food to energy, we must remain committed to protection of our shared resources, not only for future generations but also for the intrinsic value of a thriving ocean. We strongly urge Commissioners and staff to only consider actions to improve and strengthen protections and to reject petitions that do not align with the guidance from the MLPA. We also encourage the approval of Petition 2023-27MPA, to reclassify the Anacapa SMCA into a SMR or, at a minimum, reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.

Thank you for your consideration of our comments. If you have any questions, please contact Azsha Hudson, ahudson@environmentaldefensecenter.org.

Sincerely,

Azsha Hudson, Marine Conservation Analyst
Environmental Defense Center

Linda Krop, Chief Counsel
Environmental Defense Center

Attachments

- Signed Petition Postcards from Patagonia Tabling- 2.1.2024
- Frenchys-Cove-Sign-On_FINAL_2023_11_29

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, [redacted]

(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

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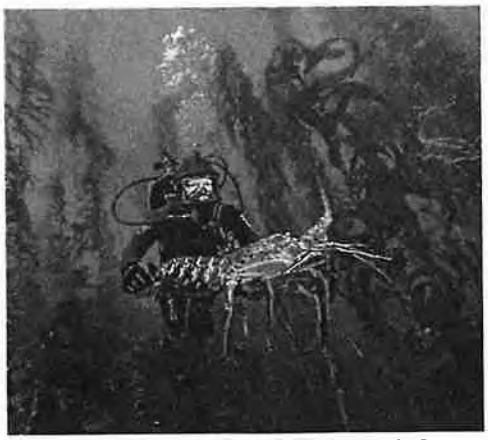

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely, RUGILE PEKUNAS

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Ventura, CA [redacted]

(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]
(Email)

[redacted]
(Address)

Ventura CA [redacted]
(City, State, Zip)

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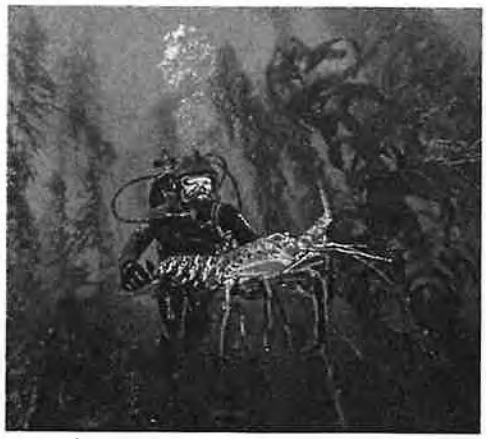

Photo Credit: Brett Seymour, NPS

Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

SOPHIA MILLER
(Print name)

[redacted]
(Email)

[redacted]
(Address)

OAK VIEW, CA [redacted]
(City, State, Zip)

By signing this you agree to receive updates from the Environmental Defense Center.

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: Anacap SMCA at Anacapa Island</u>

Dear President Sklar and Honorable Commissioners:

The undersigned organizations have decades of combined experience and interest working on Marine Protected Area ("MPA") management, research, compliance, outreach, and education efforts. We submit this letter to support the submission of an MPA petition for the Anacapa State Marine Conservation Area ("SMCA") as a part of the Decadal Management Review ("DMR") process. This petition seeks to reclassify the Anacapa SMCA as a State Marine Reserve ("SMR") or at a minimum reclassify the portion of the SMCA from shore to at least 30 meters depth to better protect eelgrass habitat.

The DMR is a momentous step in adaptive and community-based conservation. We commend the California Fish and Game Commission, California Department of Fish and Wildlife, and California Ocean Protection Council for the enormous effort undertaken to

complete this first 10-year review. The MPA Network was designed to function as an ecological network to ensure the protection of California's diverse coastal ecosystems. Eelgrass meadows are one of the may habitats protected by MPAs. The eelgrass found in California and at Anacapa Island is *Zostera marina.* This subspecies of eelgrass used to be abundant at multiple sites at Anacapa island until white urchin (*Lytechinus anemesus)* populations increased and invaded the area following the 1983 El Nino. Transplantation efforts at Anacapa Island have had some success, however the shift of spiny lobster trapping to soft bottom habitat has led to a decline in the transplanted eelgrass population at Frenchy's Cove.

Anacapa Island Historic Eelgrass Cover

Eelgrass plays an important role in many marine systems like species survival, reducing coastal erosion, acting as a carbon sink, etc. Globally eelgrass populations have declined during the past 25 years through a combination of natural and anthropogenic deterioration. By 1995, only 2 small eelgrass patches were present at East Anacapa Island, and both disappeared by 1999. Past research at Anacapa Island found that there had been no sign of recruitment at Frenchy's Cove since 1991 up until the 2000s when efforts were made to reintroduce eelgrass into the area. The annual surveys conducted from 1991 to 2001 at Frenchy's Cove revealed no eelgrass seedlings, adult plants, or drift material, underlining the limited long-distance dispersal capabilities of this species.

Impacts to Anacapa SMCA Eelgrass Meadows

Follow up surveys in 2014 and 2016, after the transplantation effort in the early 2000s, found the transplanted eelgrass meadows at the Anacapa SMCA to be damaged and greatly reduced. Information gained from mariners and National Park rangers revealed that Frenchy's Cove was being fished heavily during the two months (November, December) that the brown pelican Special Closure was open. Fishing block data for the mainland showed that effort more than doubled within blocks containing fishing areas adjacent to SMRs. Notably, eelgrass continues to thrive within the Anacapa SMR, 200 meters to the east.

Before the shift in fishing efforts for spiny lobster, in 2012 the research team responsible for the transplantation in the early 2000s found additional patches 200 meters to the east of the transplant site and scattered shoots were observed at the west end of East Anacapa Island. The unintended differences in usage of the SMCA and SMR showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (i.e., trapping) were to cease.

The impact of fishing for spiny lobster during the two months allowed is destroying the eelgrass meadows. Research shows that recruitment of new eelgrass is a long process, but it is possible when the ideal habitat is left undisturbed. Currently the SMCA allows for recreational take of spiny lobster and pelagic finfish and commercial take of spiny lobster. The Brown Pelican special closure allows for lobster traps in November and December. We ask that the SMCA be reclassified as a SMR or reclassifying the portion of the SMCA from shore to at least 30 meters depth.

Conclusion

We celebrate the success of the MPA network in a time when ocean conservation wins are more important than ever. While we rely on oceans to contribute to many of our societal needs, from food to energy, we must remain committed to protection of our shared resources, not only for future generations but also for the intrinsic value of a thriving ocean. This petition to reclassify the Anacapa SMCA as an SMR or reclassifying the portion of the SMCA from shore to at least 30 meters depth will allow Anacapa Island to recover its historic eelgrass meadow.

Thank you for your consideration of the MPA petition. If you have any questions, please contact Azsha Hudson, ahudson@environmentaldefensecenter.org.

Sincerely,

Azsha Hudson, Marine Conservation Analyst
Environmental Defense Center

Richard Smalldon, Director
Santa Barbara Museum of Natural History, Sea Center

Robert Mazurek, Executive Director
California Marine Sanctuary Foundation

Tomas Valadez, California Policy Associate
Azul

Elizabeth Purcell, Policy and Communications Intern
Turtle Island Restoration Network

Ted Morton, Executive Director
Santa Barbara Channel Keeper

Jim Taylor, Group Chair
Sierra Club, Santa Barbara – Ventura

Robert Vergara, Roger Arliner Young (RAY) Ocean Conservation Fellow
Natural Resources Defense Council

Ashley Eagle-Gibbs, Interim Executive Director & Legal and Policy Director
Environmental Action Committee of West Marin (EAC)

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 23:27:03.35	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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2024-02-02 22:22:27.137		Timothy	Watson		[redacted]	Middle Grove	NY	[redacted]	US	Petition Signed
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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

From: Azsha Hudson <[redacted]>
Sent: Wednesday, February 21, 2024 02:58 PM
To: FGC <FGC@fgc.ca.gov>
Subject: 2023-27 MPA Supplemental Research

Good afternoon,

I have attached a three-page write-up for agency staff to use as they review MPA Petition 2023-27MPA. It is addressing some of the questions posed by a Commissioner during the February FGC Meeting.

Thank you!

AZSHA HUDSON (she/her/hers)
MARINE CONSERVATION ANALYST
906 Garden Street
Santa Barbara, CA 93101
o: 805.963.1622 X 105 c: 805.263.7071
www.EnvironmentalDefenseCenter.org

Petition 2023-27MPA Response to Questions posed by Commissioner's

Please see the below report responding to questions (bolded) posed by Commissioner Zavaleta in a follow up email after the February 14, 2024 Fish and Game Commission meeting. The response to Commissioner Zavaleta's questions were addressed by Jessie Altstatt, a researcher that has studied eelgrass at Anacapa island for years and wrote a report on her findings that prompted us at the Environmental Defense Center to submit an MPA petition.

Clarifying the spatial and temporal extent of impact on eelgrass beds from the traps and anchoring that you identified as damaging to those beds. For example, how do anchorage pits compare in size and density to natural disturbances (such as feeding pits, storm events) to eelgrass?

The species of eelgrass found at Anacapa Island, *Zostera pacifica*, has very short rootlets and typically grows within the top few centimeters of sediment. This makes it extremely sensitive to disturbance, which is why it is found only in the most sheltered areas. Deploying and pulling traps disturbs the sediment and dislodges the eelgrass and causes it to drift away. It will only "grow back" if there is still material left behind. Deploying and pulling traps is akin to anchoring, which is known to be a major threat to eelgrass beds world-wide, and it's no coincidence that Channel Islands National Marine Sanctury ("CINMS") is very concerned about anchoring and disturbing the seafloor in areas of eelgrass.

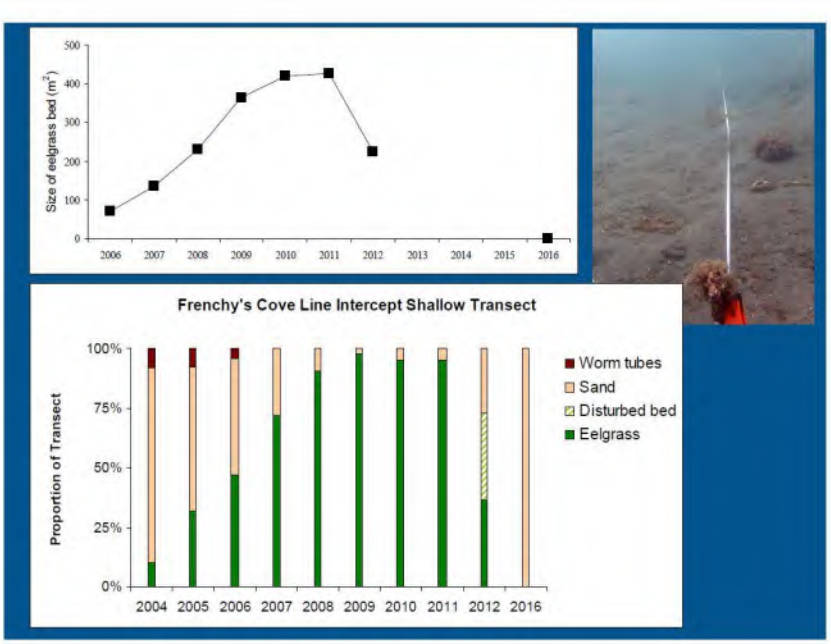
I (Jessie Altstatt) have attached a figure from a talk I gave at the 2016 California Islands Symposium, showing the main permanent transect within my restoration area at Frenchy's. Note the abandoned trap.

How long does it take for the eelgrass to grow back from each of these disturbance types? In terrestrial grasslands (which I [Commissioner Zavaleta] understand are different), for example, patchy disturbances increase overall biodiversity and vegetation recovery in them is quick.

To answer the question, how long does it take for recovery, I (Jessie Alstatt) would argue that it could take many decades if there was not a wild source of seeds or vegetative material upstream. The closest bed up current of Frenchy's is at Smugglers, > 4 miles away and across a channel between the islands. And, for any recovery, the fishing effort needs to stop. There is no other lobster fishing area that I (Jessie Altstatt) know of that specifically targets soft-sediment bottom. Frenchy's once had the largest eelgrass bed at Anacapa island (Jack Engle data). We were on our way to seeing recovery following our restoration work, and now it is gone.

The fishing pressure within the Special Closure in Frenchy's Cove is extremely intense during the two months that the commercial fishermen are allowed to enter (Nov, Dec). I (Jessie Altstatt) have routinely counted over one hundred traps within a small area. The traps are repeatedly picked up, re-baited and dropped again (~every 72 hours). In a natural system, a bat ray may create a feeding pit which disturbs an area of eelgrass possibly ~ 1 meter across, but then the ray moves on, and that area can gradually recover vegetatively growing in from all sides towards the center of the pit. My permanent transects went from nearly 100% healthy eelgrass in 2011, to ~60% cover, half of which was severely distressed.

Another figure shows numerical data (size of restoration area in square meters) and % cover along a permanent transect). During the restoration work, it took > 5 years to reach solid cover of eelgrass, and this was destroyed within a year (although I do not have the quantitative survey data from 2013-2015, I learned from other divers that most of the solid grass bed was gone by 2013).



I (Jessie Altstatt) have also attached (see below) a picture from 2016 from within Frenchy's Cove, showing how damaged the eelgrass bed was at that time. Note that the abandoned trap contains the bones of a drowned cormorant.

I (Commissioner Zavaleta) want to understand not whether there are effects of fishing and boat anchorages, but how large, spatially extensive (what % of a meadow?) and long-lasting they are.

In support of my (Jessie Altstatt) observation that traps were responsible for the damage, in 2016 there were still a few scattered eelgrass plants within the cove, but they were shallower than 20' as that is the inner limit for trap fishing. However, there is very limited habitat of the right sediment grain size in shallower than 20' due to wave action.

To address the wave action question, eelgrass is very limited by depth to areas where there is not much exposure to wave action. Frenchy's Cove is the most protected area at Anacapa Island, which is why the historic bed once grew as shallow as 20' depth.

Please also note that recently CINMS performed a Climate Vulnerability Assessment and protecting eelgrass habitat was among the top 2 proposals discussed by the group. There was a list of action items created by the group, and excluding trap fishing was on that list- but ultimately NMS has no control over state-managed fisheries.

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

FGC@FGC

From: david rowell [redacted]
Sent: Monday, December 9, 2024 12:19 PM
To: FGC
Subject: Marine Protected Areas (MPAs) Proposal

I would like to express my support for improving and adding more MPAs. I have lived in Santa Barbara for 40 years and have frequently been SCUBA diving at the SB Channel Islands. The ecosystem inside an MPA is clearly benefiting from the protection. Frankly, it reminds me of diving in the 1980s. MPAs are critically important not only for recovery of fisheries but also enrichment of areas outside the MPA.

In addition, I support the proposal to reclassify Anacapa Island State Conservation Area as s State Marine Reserve. This will serve to protect the eelgrass in the shallow waters, which as you are aware is a breeding ground for juvenile marine organisms. This designation will not only assist this location but also serve to enhance the entire ecosystem with greater replenishment.

I fully acknowledge the issues the commercial fisherman have raised given this is their livelihood. However, I do think expanding MPAs which serve as sanctuaries from over fishing and it will create much more productive fishing in other areas through restocking. In terms of maintaining sustainable fisheries, I believe Cal Fish and Game should review the number and type of commercial fishing licenses in various areas such as Santa Barbara. Given the lower overall catch and the difficulty of making a living as a commercial fisherman, it might make sense to retire some licenses. This could be accomplished through a program that offers compensation plus job training.

Thank you for your consideration

David Rowell

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

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]

July 31, 2025

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

Re: <u>Comments on Fish and Game Commission Meeting Agenda Item 17C</u>
<u>Support for Marine Protection Area Network and Petition 2023-27MPA</u>

Dear President Zavaleta and Honorable Commissioners:

We are writing to express our strong support for California's Marine Protected Area ("MPA") network and ask that the California Fish and Game Commission ("FGC") take action to maintain, improve, and strengthen the integrity of the network and the critical protections it provides. Specifically, we ask the FGC to support adaptive management of the Anacapa Island State Marine Conservation Area ("SMCA") (2023-27MPA) to better protect restored eelgrass meadows.

As business owners who are both reliant on our planet's marine resources and committed to protecting them, we strongly support efforts to maintain and enhance protections for this culturally, historically, and ecologically significant environment.

A decade has passed since California designated the MPA network, and it is performing as intended according to extensive scientific research as part of the Decadal Management Review ("DMR") conducted by the California Department of Fish and Wildlife ("CDFW"). The state can now make improvements to enforcement and other management issues that have emerged since the original designation, while building on the existing MPA network.

One area of improvement the MPA Network can benefit from is ensuring protection of the variety of habitats included within the network. Eelgrass plays an important role in many marine systems such as species survival, reducing coastal erosion, acting as a carbon sink, etc. Globally, eelgrass populations have declined during the past 25 years through a combination of natural and anthropogenic deterioration. By 1995, only 2 small eelgrass patches were present at East Anacapa Island, and both disappeared by 1999. Luckily replantation and restoration efforts started in the early 2000s at the Anacapa SMCA and State Marine Reserve ("SMR").

Unfortunately, follow up surveys in 2014 and 2016 found the transplanted eelgrass meadows at the Anacapa SMCA to be damaged and greatly reduced. Notably, eelgrass continues to thrive within the Anacapa SMR, 200 meters to the east.

The 2014 and 2016 surveys included information gained from mariners and National Park rangers and revealed that Frenchy's Cove was being fished heavily during the two months (November and December) that the brown pelican Special Closure was open. Fishing block data for the mainland showed that effort more than doubled within blocks containing fishing areas adjacent to SMRs. The increased fishing pressure led to an increase in hard bottomed objects resting on top of eelgrass for extended periods. This phenomenon causes blades to become broken or abraded, which may disrupt normal blade function.

The decline in any ecosystem can have an impact on more than the biological environment; it can have an impact on economic prospects as well. Tourism in Santa Barbara generates more than $2.24 billion, including $82.9 million in yearly tax revenue, with many local businesses benefiting from visitors. A 2023 National Park Service report showed that 323,000 people visited the Channel Islands National Park in 2022 and spent $21.8 million in communities surrounding the Park. The degradation of eelgrass meadows can have a direct impact (e.g., to businesses that focus on supporting people visiting these areas for recreation, wildlife viewing, etc.) as well as indirect impact (e.g., to businesses who rely on the ecological health and reputation of this area to attract customers) on businesses surrounding the Anacapa Island MPA.

Due to these concerns, we support Petition 2023-27MPA, which will reduce the impacts to eelgrass at Anacapa Island. We are aware that the Petitioner has come up with potential alternative solutions to help protect the meadow (please refer to EDC's July 31, 2024, letter re: Petition for Anacapa State Marine Conservation Area – Agenda Item 6(c) for more detailed explanation), including:

- Change current regulations to disallow commercial lobster fishing year round
- Change current regulations to disallow hard bottomed fishing gear near eelgrass meadows
- Change the existing border, prohibiting the deployment of lobster traps from 0-30 feet instead of the existing 0-20 meters

Accordingly, we support the Petitioner's request that the FGC and CDFW analyze these new potential solutions to find an answer that best protects the eelgrass meadow and the public's interests. We understand that the MPA petition process is ongoing with many details still being determined, with considerations of all ocean users' input combined with environmental, economic, and social data. We hope and expect that the outcome will keep the Santa Barbara Channel protected for future generations of life.

Thank you for initiating the process to participate in the adaptive management of our world-renowned MPA network. We appreciate the opportunity to provide input through this process.

Thank you,

Michelle Stevens
Founder & CEO, The Refill Shoppe

Albert DiPadova, Co-Founder
Riviera Towel Co.

John Gonzales, Founder
Leashless Brewing

Michael Cohen, President
Santa Barbara Adventure Company

Chris Ragland, Executive Director
Sea League

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)

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Please Protect Our Ocean

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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)

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Please Protect Our Ocean

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Robert Demetriou

[redacted]

(Email)

[redacted]

(Address)

Ojai, CA 93023

(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

ADAM Lenhard
(Print name)

[redacted]
(Email)

(Address)

Ventura
(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,

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

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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

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Sincerely,

Brenda Major [redacted]

(Print name) (Email)

[redacted] 93103

(A (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,

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

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Sincerely,

Gerardo Arzate
(Print name)

(Email)

(Address)

Santa Barbara, CA 93103
(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,

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

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Sincerely,

Andrea Sperling
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Pismo Beach, CA, 93449
(City, State, Zip)

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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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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

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Milly Beeber

(Print name)

[redacted]

(Email)

[redacted]

(Address)

Santa Barbara, CA 93103

(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,

Harriet Eckstein [redacted]

(Print name) (Email)

[redacted] Santa Barbara CA 9310

(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

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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,

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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Sincerely,

Aidaly Xicotencatl
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Colton Ca, 92324
(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,

Charles Mugler

(Print n[redacted])

(Email) [redacted]

(Address) [redacted]

(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,

Erika Zollett
(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.

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,

HUGH KELLY
(Print name)

[redacted]
(Email)

(Address)

SANTA BARBARA
(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,

INGE ROSE [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,

Mariam Garcia
(Print name)

[redacted]
(Email)

(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,

Hazel Vaquero
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara, 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,

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

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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,

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,

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,

Clifford Ghersen
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara, 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,

Angelica Ace

(Print name)

[redacted]

(Address)

[redacted]

(Email)

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,

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]

(Address)

[redacted]

(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,

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

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Sincerely,

Camila Erickson [redacted]

(Print name) (Email)

[redacted] Isla Vista

(Address) (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,

Douglas Myers
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Apple Valley, CA 92307
(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,

Jan Myers

(Print [redacted])

[redacted]

(Email)

(Address)

Apple Valley, CA 92307

(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,

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

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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,

NANCY COLLINS

(Pri[redacted]

[redacted]

(Email)

(Address)

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)

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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,

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)

(Address)

SB CA 93101

(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,

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,

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)

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,

Paige Caras [redacted]

(Print name) (Email)

[redacted] Santa Barbara, CA 93109

(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,

Shawn Velarde [redacted]

(Print) (Email)

[redacted] Ventura, CA 93003

(Address) (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,

Jamie Diaz
(Print name)

[redacted]
(Email)

(Address)

SB, 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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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] (Address) SB 93105 (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,

Patricia Rose
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Carson, CA 90745
(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,

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,

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,

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 9310[redacted]

(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]) [redacted] (Email)

(Address) [redacted] Calif. 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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Sincerely,

MARCO CERVANTES
(Print name)

[redacted]
(Email)

(Address)

SB, CA 93101
(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,

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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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

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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,

ANDREW GARDNER

(Print name)

[redacted]

(Address)

[redacted]

(Email)

SANTA BARBARA, CA 93108

(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,

Glenn Hallam

(Printed name) [redacted]

(Address)

(Email)

Oxnard, CA 93035

(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,

Brian Trautwein

[redacted]

(Email)

(P[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,

_____ _____

(Print name) (Email)

_____ _____

(Address) (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,

Randy Evered [redacted]

(Print) (Email)

[redacted] Santa Barbara, CA 93105

(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,

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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Please do what is right for our community and protect our ocean's unique biodiversity for future generations of ocean users.

Sincerely,

Miranda Aguilar [redacted]

(Print) (Email)

[redacted] Ventura, CA, 93003

(Address) (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,

Danielle Muller
(Print name)

[redacted]
(Email)

[redacted]
(Address)

San Diego, CA 92107
(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,

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,

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,

Emily Hunt
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Ventura, CA 93003
(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, 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

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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

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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

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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

(Print name)

[redacted]

(Email)

(Address)

Ventura 93003

(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,

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

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Sincerely,

Elizabeth Rodero — [redacted]

(Print name) (Email)

(Address) Ojai 93023 (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,

Hector Mejia

[redacted] Camarillo, CA 93010

(Address)

[redacted]

(Email)

(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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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

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Sincerely,

Sean McArthur
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara
(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Lyndsey McNeill
(Print name)

[redacted]
(Email)

[redacted] Goleta, CA 93117
(Address)

(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,

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,

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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,

Chloe Hu
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Goleta, 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,

Sidney Loftman
(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,

Rebecca Williams
(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,

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

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,

Kinga Bihari
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Isla Vista, 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,

Bellett Stubbs-Friedmann

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Goleta, 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,

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,

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,

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,

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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,

Michelle [redacted]

(Print name) (Email)

[redacted] Goleta

(Address) (City, State, Zip)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

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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,

Jennifer Gould
(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,

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

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Photo Credit: Brett Seymour, NPS

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Sincerely,

Alexandra Wang

[redacted]

(Address)

[redacted]

(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

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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,

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

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Sincerely,

Mohamed Zaid Fayyaz
(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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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]

(Print) (Email)

[redacted] ~~Home~~ Shaker Heights, OH 44120

(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,

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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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 93365
(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,

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)

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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,

Paige Grinnell
(Nombre)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

CA 93117
(Ciudad, Estado, Código postal)

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Please Protect Our Ocean

Dear Fish & Game Commissioners,

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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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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, 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,

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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)

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,

Hannah Jones
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Laguna Niguel, CA, 92677
(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,

Catherine Pizzinat

(Print name)

[redacted]

(Address)

[redacted]

(Email)

Goleta, CA 93110

(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,

Maria Malafei

(Print name)

[redacted]

(Email)

[redacted]

(Address)

Goleta, CA 93117

(City, State, Zip)

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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:

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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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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,

Gloria 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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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,

Zach Zavodnik
(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,

Katrina Rugeda [redacted]

(Print name) (Email)

[redacted] Goleta, CA 93117

(Address) (City, State, Zip)

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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, Clio Salles Spar

(N[redacted]

(Dirección)

[redacted]

(Correo electrónico)

[redacted] Dobbs Ferry, NY, 10533

(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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Sincerely,

Isabel Saavedra [redacted]

(Print name) (Email)

[redacted] Goleta, CA 93117

(Address) (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,

Sam Maybaum
(Print name)

[redacted]
(Email)

[redacted]
(Address) 93117

Goleta, CA, 93117
(City, State, Zip)

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Estimados Comisarios de Pesca y Caza:

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Arushi Lakhanpal
(Nombre en letra imprenta)

[redacted]
(Dirección)

[redacted]
(Correo electrónico)

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)

(Correo electrónico)

(Dirección)

93101 Vista [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)

[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, 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]

(Correo electrónico)

[redacted]

(Dirección)

GOLETA, CA 93117

(Ciudad, Estado, Código postal)

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Autor de la foto: Brett Seymour, NPS

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Atentamente,

Chenen 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)

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,

Claire Cady
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Santa Barbara 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,

Julia Dahl
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Isla Vista, 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,

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,

Pallas Lemarchand [redacted]

(Address)

[redacted] (Email)

Campbell, CA, 95008

(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,

Annie Gleason
(Print name)

[redacted]
(Email)

[redacted]
(Address)

Centennial, CO, 80122
(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,

Betzaida Chavez

(Nombre en letra imprenta)

[redacted]

(Dirección)

[redacted]

(Correo electrónico)

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,

Irene Caballero [redacted]

(Print) (Email)

[redacted] Ventura, CA 93117

(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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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)

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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, Ciara Garcia

(Nombre en letra imprenta)

[redacted]

(Correo electrónico)

[redacted]

(Dirección)

Goleta

(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,

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

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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,

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 _____ [redacted] _____

(Print name) (Email)

[redacted] Goleta, CA 93117

(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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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

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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]
(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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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

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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

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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,

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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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,

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,

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,

VIVIANA MARSANO
(Print name)

[redacted]
(Email)

(Address)

(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,

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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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.

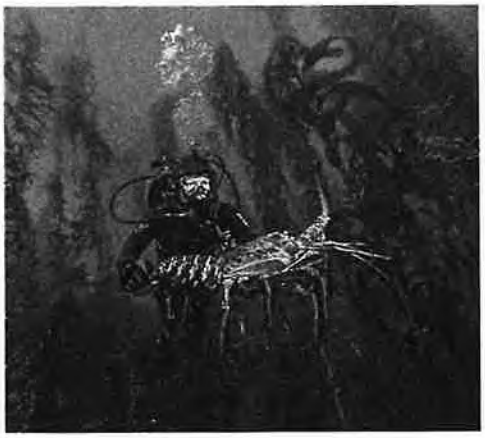

Photo Credit: Brett Seymour, NPS

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Sincerely,

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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Photo Credit: Brett Seymour, NPS

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Sincerely,

Wyatt Sanchez
(Print name)

[redacted]
(Address)

Hills, CA, 91354

[redacted]
(Email)

(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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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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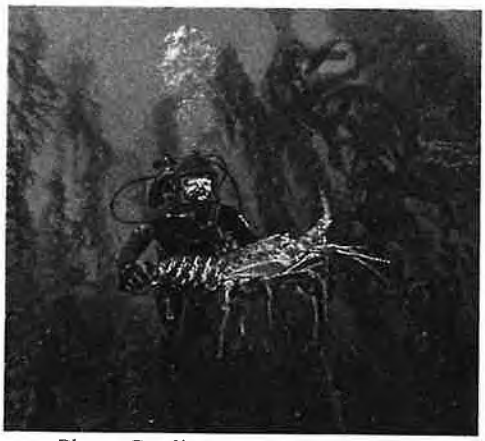

Photo Credit: Brett Seymour, NPS

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Sincerely,

Johnny McConville
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Santa Barbara, CA
(City, State, Zip)

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Photo Credit: Brett Seymour, NPS

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Sincerely, Angel Fajardo
(Print name)

[redacted]
(Address)

[redacted]
(Email)

Camarillo, Ca, 93010
(City, State, Zip)

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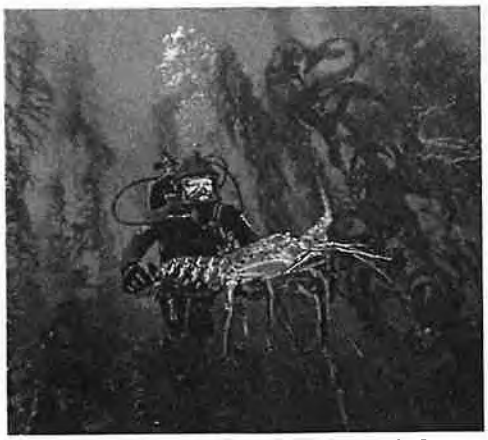

Photo Credit: Brett Seymour, NPS

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Sincerely, RUGILE PEKUNAS
(Print name)

(Address)

[redacted]
(Email)

Ventura, CA 93004
(City, State, Zip)

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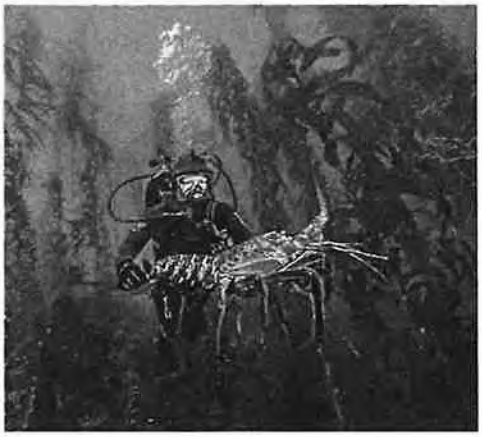

Photo Credit: Brett Seymour, NPS

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Sincerely,

Alecia Locke
(Print name)

[redacted]
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(Email)

Ventura CA 93003
(City, State, Zip)

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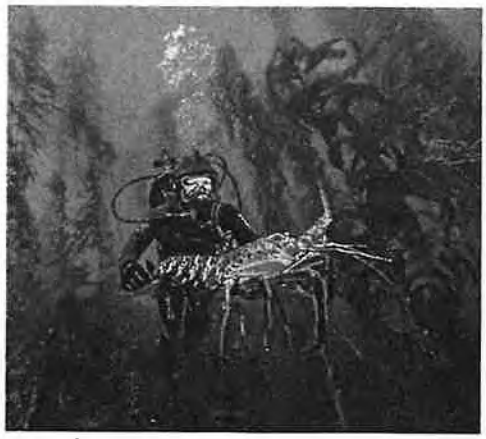

Photo Credit: Brett Seymour, NPS

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Sincerely,

SOPHIA MILLER
(Print name)

[redacted]
(Address)

OAK VIEW, CA 93022

[redacted]
(Email)

(City, State, Zip)

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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.

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

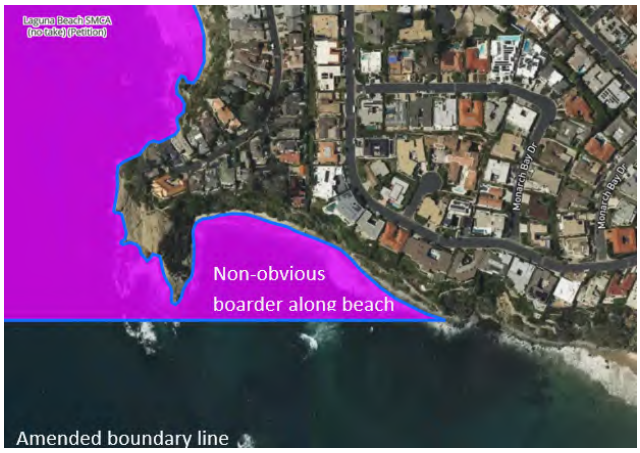
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced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

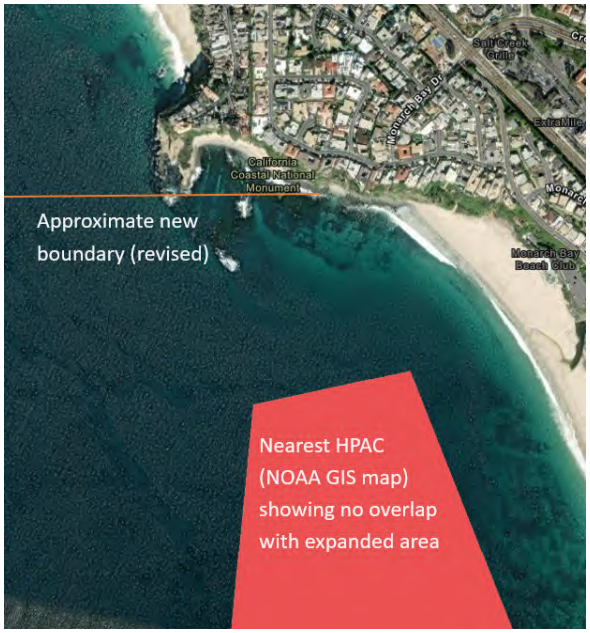
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational 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).

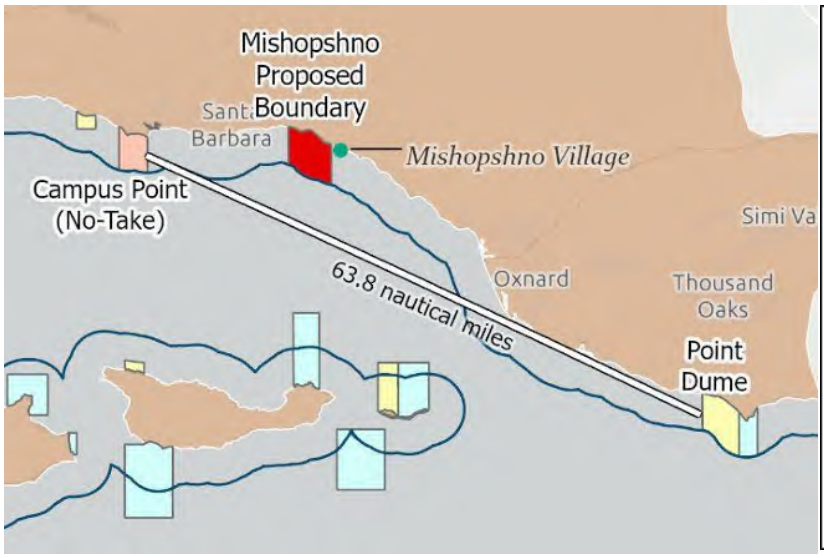


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

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).

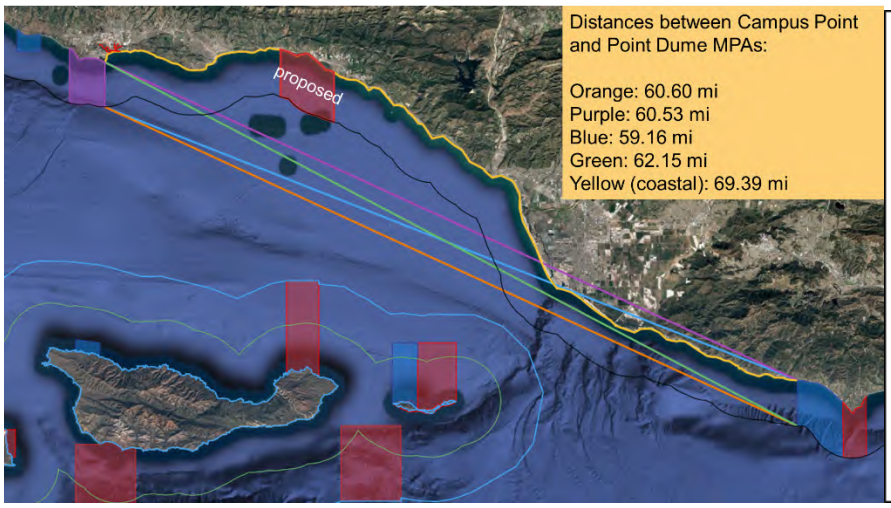


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

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.

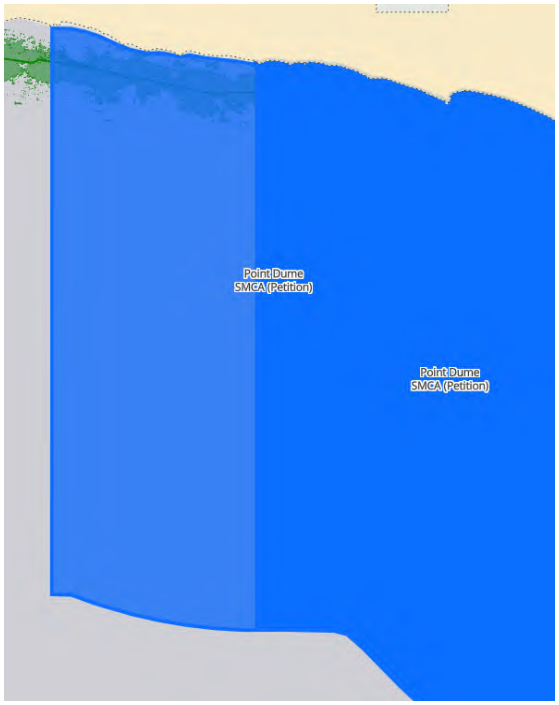
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing 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.

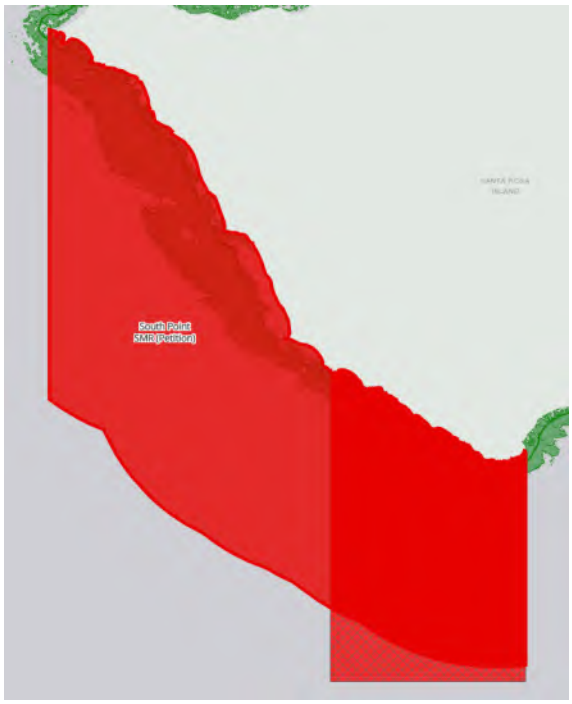
<u>Petition2023-33MPA – Reject</u>

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

Received February 24, 2026

February 16, 2026

RE: Opposition to Petition 2023-27MPA_AM1 (Anacapa SMR)

Dear Commissioners,

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

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

I. Failure to Meet Coastal Fishing Communities Policy Objectives

The Coastal Fishing Communities Policy commits the Commission to:
(1) meaningfully engage fishing communities;
(2) factor community interests into decision-making; and
(3) increase adaptive capacity and resilience.

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

A. Lack of Meaningful Engagement

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

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

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

B. Absence of Socioeconomic Impact Analysis

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

C. Undermining Community Resilience and Adaptive Capacity

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

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

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

.

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

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

III. The Proposed Closures Are Far Broader Than Scientifically Justified

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

A. Deeper Than Needed

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

B. Larger Area Than Needed

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

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

IV. Problematic Precedent

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

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

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

V. Conclusion

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

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

Respectfully submitted,

Commercial Fishermen of Santa Barbara
Chris Voss, President
Kim Selkoe, Executive Director

California Lobster and Trap Fishermen's Association
Ava Schulenberg, Executive Director

Ventura County Commercial Fishermen's Association
Jason Woods, President
Dave Colker, Executive Director

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

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

Marine Conservation Institute
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www.marine-conservation.org

Outlook

Comment Letter re Agenda Item 2 April FGC

From Azsha Hudson <ahudson@environmentaldefensecenter.org>
Date Wed 04/01/2026 01:41 PM
To FGC <FGC@fgc.ca.gov>

Hi,

For the April FGC meeting agenda item 2, please see the attached letter that addresses CDFWs recommendations (**2023-27-MPA-AM**) and new data that shows eelgrass recovery within the SMR but significant eelgrass loss within the SMCA. Thank you!

AZSHA HUDSON (she/her/hers)
MARINE CONSERVATION ANALYST & PROGRAM MANAGER
906 Garden Street
Santa Barbara, CA 93101
o: 805.963.1622 X 105 c: 805.263.7071
www.EnvironmentalDefenseCenter.org

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.

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environmental
DEFENSE CENTER

April 1, 2026

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

Re: Fish and Game Commission Agenda Item 2 re New Science and Historical Rationale Not Considered in CDFW Evaluation of Anacapa Island SMCA Petition (2023-27-MPA-AM)

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

We urge the Fish and Game Commission (FGC) to consider our response below to California Department Fish and Wildlife's (CDFW) assessment of Petition 2023-27-MPA-AM. CDFWs recommendation ignores the hyper local science that has been conducted at Anacapa Island since the early 2000s and the inclusion of habitat protection in the intentions set for the Channel Island MPAs. We urge the FGC to rely upon the most up to date science to adaptively manage[1] the Marine Protected Area (MPA) Network, and below we provide a synopsis of **new data**, including geo-located eelgrass habitat surveys at Anacapa from 2024, as well as **historical intent** to underscore the need for additional regulatory protections at Anacapa Island and the importance of approving petition 2023-27-MPA-AM.

I. KNOWN IMPACTS ON EELGRASS AT ANACAPA ISLAND

Over the past decade, significant research has been conducted at Anacapa Island within the specific MPAs referenced in petition 2023-27-MPA to better understand how policy protections can support eelgrass ecosystem recovery and safeguard this critical species. Available data demonstrates that lobster traps set in Anacapa State Marine Conservation Area (SMCA) cause significant harm to eelgrass recovery efforts.[2] Scientific habitat surveys since 2009 have shown that eelgrass beds in the nearby Anacapa State Marine Reserve (SMR) were healthy,

[1] "Adaptive management processes being the collection of information and judgments regarding the performance of individual MPAs and of networks at an ecosystem level, to change the configuration and regulations of the MPA to reflect new information and experience." California Department of Fish & Game. California Marine Life Protection Act Master Plan for Marine Protected Areas. Revised Draft January 2008. Pg 83.
[2] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities.

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while those in the SMCA were degraded or nonexistent following lobster season. Notably, as the SMCA and SMR are next to each other, any macro impact (i.e. climate change, pollution, ocean warming events like the 2014-2016 marine heat wave, etc.) and/or site-specific attributes (i.e. "temperature, currents, and suitable substrate to sustain eelgrass") to the SMCA would also have an impact on the eelgrass located within the SMR. The primary difference between sites is that the SMCA allows for commercial and lobster traps during a two month season each year.

A. Eelgrass is Impacted by Lobster Traps as Shown by the Many Surveys Conducted at Anacapa Island Specifically and Globally.

Anacapa-specific research has demonstrated negative impacts from lobster fishing traps and bottom gear. In the paper "Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities" by Alstatt et al (2021):

- "Observations and data collected at the restoration site in 2011 and 2012 suggested that something was impacting the soft bottom habitat within Frenchy's Cove. Information gained from mariners and National Park rangers confirmed that the cove was being targeted by trap fishing during the commercial season months of November and December."[3]
- [Our findings] "determine that the commercial lobster trap fishery had severely impacted the epicenter of our restored eelgrass bed within the Anacapa State Marine Conservation Area at Frenchy's Cove. Eelgrass occurring within the neighboring marine reserve was flourishing."[4]

Attachment A: Petition 2023-27MPA Supplemental Information

- "The fishing pressure within the Special Closure in Frenchy's Cove is extremely intense during the two months that the commercial fishermen are allowed to enter (Nov, Dec). I (Jessie Altstatt) have routinely counted over one hundred traps within a small area. The traps are repeatedly picked up, re-baited and dropped again (~every 72 hours). In a natural system, a bat ray may create a feeding pit which disturbs an area of eelgrass possibly ~ 1 meter across, but then the ray moves on, and that area can gradually recover vegetatively growing in from all sides towards the center of the pit. My permanent transects went from nearly 100% healthy eelgrass in 2011, to ~60% cover, half of which was severely distressed."
- The picture below is from a presentation Jessie Altstatt gave at the 2016 California Islands Symposium, showing the main permanent transect within the restoration area at
- Frenchy's, within the SMCA where trap fishing is currently allowed. Note the abandoned trap in the Figure 1.

[3] *Id.* At page 2.
[4] *Id.* At page 3.

Figure 1. Replanted eelgrass within Anapaca SMCA in 2009, and the same transect site in 2012 where eelgrass was no longer present, and an abandoned lobster trap was found instead.

Figure 2: NEW DATA - Eelgrass Distribution at Anacapa Island

- Data used to inform the map in Figure 2 comes from a 2009 survey via snorkel after restoration efforts, a 2012 survey conducted via snorkel after restoration efforts, and a **2024 SCUBA and surface snorkel survey** at the 2009 and 2012 survey sites, all collected by scientific survey teams at Anacapa SMCA and SMR.

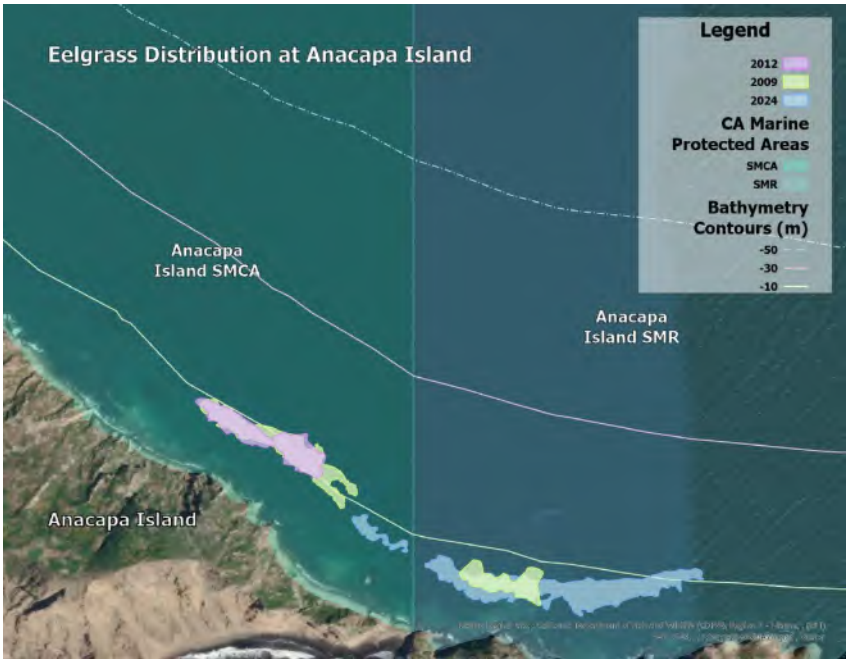

Figure 2.

B. New 2024 Data Shows that Eelgrass Coverage has Only Declined in the Anacapa SMCA Where Lobster Fishing is Permitted.

As shown in Figure 2, the 2000s replantation efforts of Altstatt and her team have been diminished in the SMCA as of 2024, while the eelgrass located within the SMR has grown. CDFWs assertion that other factors like warming events and site-specific characteristics are what are "contributing to the lack of recovery of eelgrass in Frenchy's Cove"[5] within the SMCA ignore the data that eelgrass in the adjacent SMR is thriving. The two MPAs have dramatically different eelgrass distributions due to the main management difference: two months of lobster trap season within the SMCA. Research conducted at Anacapa Island points to lobster traps as the main transgressor at Frenchy's Cove within Anacapa SMCA. The two-month window that allows for bottom contact fishing gear has led to such a significant decline in eelgrass currently that it is imperative that we adaptively manage this MPA and modify the regulations to protect eelgrass so that the small remaining amount can recover.

II. THE CHANNEL ISLANDS WERE EXPLICITLY ESTABLISHED TO PROTECT HABITATS INCLUDING EELGRASS.

CDFW suggests that all the options presented in Petition 2023-27-MPA-AM "deviate from the original intent of the Anacapa Island SMCA"[6] because there may be potential consumptive losses to commercial and recreational fishing. However, this ignores research from nearby MPAs within Santa Barbara which show that SMRs enhance commercial lobster catches by more than 225%[7]. Furthermore, the common theme found within the Channel Islands Environmental Document, Master Plan, Decadal Management Report, the Marine Life Protection Act, and other foundational documents, is adaptive management is an "open-ended tool" that takes results gathered from monitoring efforts to develop adaptive management strategies, and that a primary goal of adaptive management should be to protect at least 25 acres of rare eelgrass habitats – and up to 30% of existing eelgrass meadows - within each of Anacapa's MPAs as feasible.[8]

A. The MPAs at the Channel Islands were Established to Conserve Eelgrass.

Eelgrass is one of the key habitats that must be protected through MPAs as identified by the Master Plan Science Advisory Team (SAT), and this petition supports the continued effective

[5] California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition: March 2026. Amend Existing Anacapa Island SMCA or Special Closure to Protect Eelgrass (2023-27MPA_AM). Pg 7.
[6] *Id.*
[7] Lenihan HS, *et.al.* Evidence that spillover from Marine Protected Areas benefits the spiny lobster (Panulirus interruptus) fishery in southern California. Sci Rep. 2021 Jan 29;11(1):2663. doi: 10.1038/s41598-021-82371-5. PMID: 33514853; PMCID: PMC7846765. Pg 5.
[8] California Department of Fish & Game. California Marine Life Protection Act Master Plan for Marine Protected Areas. Revised Draft January 2008. Pg 74-75.

protection of a key SAT priority eelgrass habitat. [9] If approved, it would prevent lobster traps from degrading habitat and reducing eelgrass coverage per the SAT's guidelines:

> "For the three sub-habitats eelgrass, tidal flats, and coastal marsh to be considered present, a minimum of 25 acres of each must be included within an MPA. The SAT recommends that wherever possible, a mixture of estuarine subhabitats be protected in close proximity to one another to allow for the movement of species among sub-habitats." [10]

As research shows that lobster traps are directly responsible for substantially degrading eelgrass habitat, proposed management updates would help to meet SAT guidelines and increase connectivity between the MPAs by protecting eelgrass habitats across both the SMR and the SMCA. The following lists some additional goals from the Channel Islands Environmental Document that CDFW's recommendations fail to consider:

Longstanding Channel Island management priorities underscore the need to protect eelgrass habitats. The Final Environmental Document Marine Protected Areas in the Channel Islands National Marine Sanctuary Volume I explicitly calls out eelgrass protection as a management priority:

- "Given the criteria that MPAs should include at least 30 percent of existing eelgrass meadows, and that large and contiguous MPAs are most effective for conservation"[11]
- "One of the goals for MPAs is to protect populations of special concern, which include species of economic importance, keystone species, declining, threatened or endangered species, and habitat-forming species."[12]
- "The proposed conservation area is an extension of the North Anacapa SMR to provide additional habitat and species protection."[13]

B. Petition 2023-27-MPA-AM Aligns with the Marine Life Protection Act Goals, Particularly Goals 1, 2, and 3.

Goal 1: Protecting the eelgrass from uprooting by hard bottomed items will directly "protect the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems"[14] by removing a significant and specific threat to eelgrass – recreational and commercial lobster fishing. In its absence, the 2021 study authors explicitly

[9] California Natural Resources Agency. (2009). California Marine Life Protection Act Initiative: Draft Methods Used to Evaluate Marine Protected Area Proposals in the MLPA South Coast Study Region. Pg 9.
[10] California Natural Resources Agency. (2009). California Marine Life Protection Act Initiative: Draft Methods Used to Evaluate Marine Protected Area Proposals in the MLPA South Coast Study Region. Pg 11.
[11] Final Environmental Document Marine Protected Areas in NOAA's Channel Islands National Marine Sanctuary Volume I. Pg 5-13
[12] *Id.*
[13] *Id.* At page 5-25
[14] MLPA, 2853.b.1

state: **"Our restoration work showed that eelgrass will rapidly colonize and thrive if anthropogenic disturbance (trapping) were to cease."**[15]

Goal 2: Petition 2023-27MPA also "sustains, conserves, and protects marine life populations"[16] of both eelgrass and a wide range of marine species that rely on and benefit from eelgrass, as shown by studies indicating higher biodiversity in areas with eelgrass versus the bare sandy bottom that results from lobster trapping and damage from boat anchors.[17] Global research has also shown that fully protected MPAs confer biodiversity and biomass benefits,[18] which further supports the request of this petition.

Goal 3: Anacapa's transplanted eelgrass beds are a critical "study opportunity"[19] for understanding how to restore eelgrass in other parts of California and temperate climates. Anacapa Island is an important natural laboratory that has been used by researchers to inform broader eelgrass management efforts since the 1980s.[20] Increasing eelgrass research and recovery is a priority for agencies including OPC and NOAA. The proposed alternative solutions can support that important work by helping restore eelgrass beds where they are currently harmed by fishing pressures.

C. Petition 2023-27-MPA-AM Aligns with the MPA Master Plan Adaptive Management Objectives, Particularly Objective 1, 2, 4, and 5[21]

Objective 1: Approving Petition 2023-27MPA will allow the eelgrass restoration efforts by Jessica Alstatt to not be voided by annual, recurring damage from lobster traps. Allowing the eelgrass within the SMCA to grow, hopefully to historic levels, directly benefits the structure and function of that ecosystem.[22]

Objective 2: Eelgrass has been categorized by the National Oceanic and Atmospheric Agency (NOAA) as a Habitat Area of Particular Concern (HAPC) for species managed under the Pacific Salmon and Pacific Groundfish Fishery Management Plans.[23] Approving any of the petition's three alternative solutions would "improve native marine life populations" through improved health and distribution of eelgrass habitat.

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[15] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities
[16] MLPA, 2853.b.2
[17] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities
[18] Grorud-Colvert, *et.al.* (2021). The MPA Guide: A framework to achieve global goals for the ocean. Science, 373(6560), eabf0861.
[19] MLPA, 2853.b.3
[20] 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).
[21] California Department of Fish and Wildlife. (2016). California Marine Life Protection Act Master Plan for Marine Protected Areas. Pg 42. Adopted by the California Fish and Game Commission on August 24, 2016. Retrieved from www.wildlife.ca.gov/Conservation/Marine/MPAs/Master-Plan.
[22] *Id.*
[23] https://www.fisheries.noaa.gov/west-coast/habitat-conservation/habitat-areas-particular-concern-west-coast

Objective 4: Protecting a known eelgrass meadow and allowing it to grow without impacts from commercial lobster fishing will "ensure comprehensive representation of all key habitats". The eelgrass replantation/restoration efforts done by Jessica Alstatt and her team occurred at both the SMCA and State Marine Reserve (SMR) at Anacapa Island where the "dramatic increase in fishing effort along all SMR boundaries (regardless of bottom type) has degraded the eelgrass meadow habitat and has extirpated eelgrass from within the Anacapa SMCA".[24]

Objective 5: Information gathered from multiple dives at Anacapa Island following the implementation of the MPAs in the early 2000s has informed the petition. The approval of this petition would be in line with adaptive management directives.

D. Lobster Fisheries Benefits Significantly from MPA Protections.

CDFW argues that there would be significant impacts to the commercial lobster fishery, despite recent studies showing how that the lobster fishery benefits significantly from highly protected MPAs. A 2021 study by Lenihan et al in the Santa Barbara Channel found that a "35% reduction in fishing area resulting from MPA designation was compensated for by a 225% increase in total catch after 6-years,"[25] indicating that on a local scale the fishery benefited from spatial protections. In another report it was found that MPA protections led to an increase in lobster biomass, density, size, and species richness within the MPA boundaries.[26] Additionally, while the intention for the SMCA at Anacapa included consideration for impacts to the lobster fishery, it also tasks CDFW, FGC, and other relevant agencies/science advisors to re-evaluate the MPAs and make modifications to improve performance.[27]

III. RESPONSIBILITY OF THE FGC TO ADAPTIVELY MANAGE THE NETWORK AS PRESCRIBED BY THE MARINE LIFE PROTECTION ACT AND MASTER PLAN.

We acknowledge that CDFW highlighted option one as the only option that would align with CDFW feasibility guidelines, increase enforceability, and enhance protections.[28] Studies conducted at Anacapa Island have shown that the success of eelgrass restoration efforts within the SMCA have been harmed, largely due to the fishing gear used by commercial lobster fishers.

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[24] Jessica Altstatt (2021). Island Eelgrass (*Zostera pacifica*): Focused Assessment of Condition and Extent of Meadows and Biological Monitoring of Associated Fish and Invertebrate Communities. Pg 24.
[25] Lenihan HS, *et.al.* Evidence that spillover from Marine Protected Areas benefits the spiny lobster (Panulirus interruptus) fishery in southern California. Sci Rep. 2021 Jan 29;11(1):2663. doi: 10.1038/s41598-021-82371-5. PMID: 33514853; PMCID: PMC7846765. Pg 5.
[26] Spanier, E. (2024). Marine protected areas–a review of their potential effects on lobster population size & structure and fisheries management. *Fisheries Research*, *275*, 107025.
[27] Final Environmental Document Marine Protected Areas in NOAA's Channel Islands National Marine Sanctuary Volume I. Pg 2-17.
[28] California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition: March 2026. Amend Existing Anacapa Island SMCA or Special Closure to Protect Eelgrass (2023-27MPA_AM). Pages 14-16.

As CDFW has flagged option one as the most feasible we urge the commission to approve Petition 2023-27_MPA-AM under option one, to change Anacapa Island SMCA regulations to disallow commercial California spiny lobster (Panulirus interruptus) fishing year-round.

At minimum, the commission should consider option three, to change the border of the Anacapa Island Special Closure, prohibiting the deployment of lobster traps from 0-30 meters (0-98.43 feet) instead of the existing 0-20 feet deep. As shown in Figure 2, the existing eelgrass coverage (blue shapefile) extends past 10 meters (approximately 33 feet). We urge the commission to weigh option three with a reduction in range, extending the existing border out to at least 50 feet in depth but ideally to a depth of 30 m to allow for easier compliance along established fathom and mapping lines.

IV. CONCLUSION: APPROVAL IS WARRANTED TO ADEQUATELY ADAPTIVELY MANAGE ANACAPA

By approving one of the three alternative solutions, the FGC will integrate the best available science into MPA policy; support the goals of the MLPA; advance federal and state policies advocating for the recovery and protection of eelgrass; and directly support the DMR's goal of adaptively managing MPAs based on findings from the past decade. We urge the Commission to rely upon science in making the decision for all petitions and come to the conclusion to approve Petition 2023-27_MPA-AM.

Sincerely,

Azsha Hudson
Marine Conservation Analyst

Maggie Hall
Deputy Chief Counsel

Attachments:

A: Letter to Erika Zavaleta responding to questions the Commissioner posed at the February 14, 2024 Fish and Game Commission meeting. Petition 2023-27MPA Supplemental Information

Attachment A

Petition 2023-27MPA Response to Questions posed by Commissioner's

Please see the below report responding to questions (bolded) posed by Commissioner Zavaleta in a follow up email after the February 14, 2024 Fish and Game Commission meeting. The response to Commissioner Zavaleta's questions were addressed by Jessie Altstatt, a researcher that has studied eelgrass at Anacapa island for years and wrote a report on her findings that prompted us at the Environmental Defense Center to submit an MPA petition.

Clarifying the spatial and temporal extent of impact on eelgrass beds from the traps and anchoring that you identified as damaging to those beds. For example, how do anchorage pits compare in size and density to natural disturbances (such as feeding pits, storm events) to eelgrass?

The species of eelgrass found at Anacapa Island, *Zostera pacifica*, has very short rootlets and typically grows within the top few centimeters of sediment. This makes it extremely sensitive to disturbance, which is why it is found only in the most sheltered areas. Deploying and pulling traps disturbs the sediment and dislodges the eelgrass and causes it to drift away. It will only "grow back" if there is still material left behind. Deploying and pulling traps is akin to anchoring, which is known to be a major threat to eelgrass beds world-wide, and it's no coincidence that Channel Islands National Marine Sanctury ("CINMS") is very concerned about anchoring and disturbing the seafloor in areas of eelgrass.

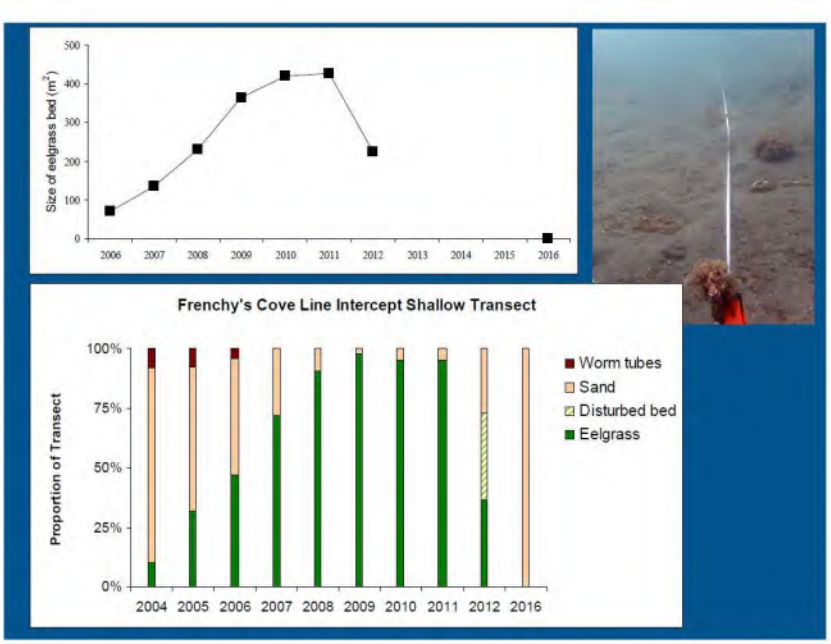
I (Jessie Altstatt) have attached a figure from a talk I gave at the 2016 California Islands Symposium, showing the main permanent transect within my restoration area at Frenchy's. Note the abandoned trap.

How long does it take for the eelgrass to grow back from each of these disturbance types? In terrestrial grasslands (which I [Commissioner Zavaleta] understand are different), for example, patchy disturbances increase overall biodiversity and vegetation recovery in them is quick.

To answer the question, how long does it take for recovery, I (Jessie Alstatt) would argue that it could take many decades if there was not a wild source of seeds or vegetative material upstream. The closest bed up current of Frenchy's is at Smugglers, > 4 miles away and across a channel between the islands. And, for any recovery, the fishing effort needs to stop. There is no other lobster fishing area that I (Jessie Altstatt) know of that specifically targets soft-sediment bottom. Frenchy's once had the largest eelgrass bed at Anacapa island (Jack Engle data). We were on our way to seeing recovery following our restoration work, and now it is gone.

The fishing pressure within the Special Closure in Frenchy's Cove is extremely intense during the two months that the commercial fishermen are allowed to enter (Nov, Dec). I (Jessie Altstatt) have routinely counted over one hundred traps within a small area. The traps are repeatedly picked up, re-baited and dropped again (~every 72 hours). In a natural system, a bat ray may create a feeding pit which disturbs an area of eelgrass possibly ~ 1 meter across, but then the ray moves on, and that area can gradually recover vegetatively growing in from all sides towards the center of the pit. My permanent transects went from nearly 100% healthy eelgrass in 2011, to ~60% cover, half of which was severely distressed.

Another figure shows numerical data (size of restoration area in square meters) and % cover along a permanent transect). During the restoration work, it took > 5 years to reach solid cover of eelgrass, and this was destroyed within a year (although I do not have the quantitative survey data from 2013-2015, I learned from other divers that most of the solid grass bed was gone by 2013).



I (Jessie Altstatt) have also attached (see below) a picture from 2016 from within Frenchy's Cove, showing how damaged the eelgrass bed was at that time. Note that the abandoned trap contains the bones of a drowned cormorant.

I (Commissioner Zavaleta) want to understand not whether there are effects of fishing and boat anchorages, but how large, spatially extensive (what % of a meadow?) and long-lasting they are.

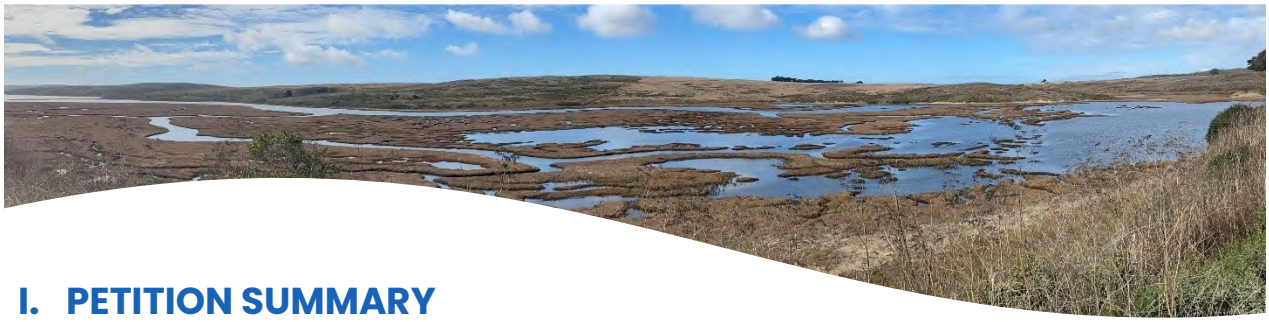
In support of my (Jessie Altstatt) observation that traps were responsible for the damage, in 2016 there were still a few scattered eelgrass plants within the cove, but they were shallower than 20' as that is the inner limit for trap fishing. However, there is very limited habitat of the right sediment grain size in shallower than 20' due to wave action.

To address the wave action question, eelgrass is very limited by depth to areas where there is not much exposure to wave action. Frenchy's Cove is the most protected area at Anacapa Island, which is why the historic bed once grew as shallow as 20' depth.

Please also note that recently CINMS performed a Climate Vulnerability Assessment and protecting eelgrass habitat was among the top 2 proposals discussed by the group. There was a list of action items created by the group, and excluding trap fishing was on that list- but ultimately NMS has no control over state-managed fisheries.

California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition:

Amend Existing Anacapa Island SMCA or Special Closure to Protect Eelgrass (2023-27MPA_AM)



I. PETITION SUMMARY

CFGC Tracking Number	2023-27MPA_AM
Petition Contact/Affiliation	Azsha Hudson, Environmental Defense Center
Number of Proposed Actions	1
Affected MPAs	Anacapa Island State Marine Conservation Area (SMCA) or Special Closure
Petition Summary	Amend existing Anacapa Island SMCA or Special Closure with one of three options to best protect eelgrass (*Zostera* spp.) meadows while allowing for community access (removed classification change and modified take regulations as amended). See detailed options in Section II.
Link to StoryMap page	2023-27MPA_AM

March 2026

II. CDFW RECOMMENDATIONS AND BRIEF JUSTIFICATION

Note: If a change to the Marine Protected Area (MPA) regulations is not needed to address the proposed change, the California Department of Fish and Wildlife (CDFW) did not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-27MPA_1_AM1 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: **Option 1:** Change Anacapa Island SMCA regulations to disallow commercial California spiny lobster (*Panulirus interruptus*) fishing year-round. **Option 2:** Change Anacapa Island SMCA regulations to disallow hard bottomed	The petitioner's stated intent for the proposed change is to protect eelgrass meadows located in the Anacapa Island SMCA from hard bottomed objects such as the gear type listed for the commercial lobster fishery and anchors used for vessels.	**Deny the petition, including all three options.** CDFW acknowledges the significant ecological importance and value of eelgrass meadows. Although there has been a decline and lack of eelgrass recovery at Frenchy's Cove, there is no indication that the primary driver of the decline or lack of recovery of eelgrass in Frenchy's Cove is bottom contact fishing gear and anchoring that may occur during the two-month window when fishing is allowed in the brown pelican (*Pelecanus occidentalis*) fledgling area. The proposed options are unlikely to have a biologically meaningful impact on eelgrass at this location beyond what is already offered by the Anacapa Island SMCA and Special Closure and brown pelican fledgling area, and it would unnecessarily restrict an important fishing ground that was carefully contemplated and deliberated during the Northern Channel Islands MPA planning and implementation process.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
fishing gear (including anchoring if applicable) near eelgrass meadows. **Option 3:** 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 0-20 feet (0-6.1 meters) deep off Anacapa Island.		

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

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

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor? If yes, a. Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area? b. Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management).	No, this petition was not submitted by a tribe or representative designated by a tribe or tribal organization, and it does not have a tribal co-sponsor.

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

IV. PETITION EVALUATION

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-27MPA_1_AM1

The petitioner has requested consideration of three options for regulatory change to enhance protection of eelgrass within Frenchy's Cove at Anacapa Island SMCA and Special Closure. The petitioner asserts that the proposed options are "intended to protect the Anacapa Island SMCA eelgrass meadow and associated biodiversity from lobster trapping [and anchoring] which occurs during the months of November and December [when the California brown pelican fledgling area is open]."

The three options proposed by the petitioner include:

1. Change Anacapa Island SMCA regulations to disallow commercial lobster fishing year-round,
2. Change Anacapa Island SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows, or
3. 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 0-20 feet (0-6.1 meters) deep off Anacapa Island.

Frenchy's Cove is a popular recreational and fishing destination on the western islet of Anacapa Island that includes a small beach and tidepools and is situated within both the island-wide nearshore Anacapa Island Special Closure and the larger Anacapa Island SMCA. The Anacapa Island Special Closure prohibits setting nets and traps around the island in waters less than 20 feet deep year-round to protect seabirds and prohibits public activities from occurring within the 20 fathom (120 feet) brown pelican fledgling area from January 1 – October 31 to protect nesting birds, nests, and fledglings during brown pelican nesting season. The west and east borders of the brown pelican fledgling area include the west end of the beach at Frenchy's Cove and Portuguese Rock, which is ~0.8 miles (~1.3 km) to the east. The Anacapa Island SMCA regulations allow commercial and recreational take of lobster and recreational take of pelagic finfish[2] (Cal. Code Regs., tit. 14, § 632 subd. (a)(3)).

CDFW acknowledges the significant ecological importance and value of eelgrass meadows and shares concern regarding the lack of eelgrass recovery at Frenchy's Cove.

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[2] Pelagic finfish as defined for MPA regulations include: northern anchovy (*Engraulis mordax*), barracudas (*Sphyraena* spp.), billfishes (family Istiophoridae), dolphinfish (*Coryphaena hippurus*), Pacific herring (*Clupea pallasii*), jack mackerel (*Trachurus symmetricus*), Pacific mackerel (*Scomber japonicus*), salmon (*Oncorhynchus* spp.), Pacific sardine (*Sardinops sagax*), blue shark (*Prionace glauca*), salmon shark (*Lamna ditropis*), shortfin mako shark (*Isurus oxyrinchus*), thresher sharks (*Alopias* spp.), swordfish (*Xiphias gladius*), tunas (family Scombridae) including Pacific bonito (*Sarda chiliensis*), and yellowtail (*Seriola dorsalis*).

The petitioner asserts that the proposed options to enhance eelgrass protection at this location align with one or more of the MLPA Goals and Decadal Management Review (DMR) Recommendations. However, given the biology of eelgrass and other factors discussed below, CDFW's evaluation finds the options proposed by the petitioner:

- Are inconsistent with the goals of this MPA, as defined during the implementation process around the Northern Channel Islands and the MLPA Initiative planning process,
- Do not align with original intent of this MPA or the full Anacapa Island Special Closure,
- Would not advance management of the MPA Network or address a current or emerging MPA management challenge,
- Would not advance management of the MPA Network, and
- Do not enhance or improve enforcement of the MPA and Special Closure regulations.

Eelgrass, a seagrass that is found in the very low intertidal to subtidal zone, is inherently episodic and variable, and the persistence of a stable meadow can be affected by many physical factors (i.e., temperature, sedimentation, currents) (Livingston 1984, Frederiksen et al. 2004, Krumhansl et al. 2021, DuBois et al. 2022). Before the MPAs were established around the Northern Channel Islands in 2003, eelgrass meadows at Anacapa Island nearly disappeared after white urchin (*Lytechinus pictus*) numbers increased and heavily grazed the eelgrass in the wake of the 1982-1983 El Niño (Alstatt 2003, 2014, 2021, Engle and Miller 2005). While many eelgrass meadows around Anacapa Island recovered and are present today, eelgrass did not re-colonize the historical site in Frenchy's Cove, and a restoration plan was developed and implemented in 2002. Restoration efforts were successful at re-establishing eelgrass in Frenchy's Cove yet monitoring and mapping efforts have observed a steady decline since (Fig. 1) (Alstatt 2014, 2021). The last mapping effort of eelgrass meadows around the Northern Channel Islands occurred in 2015, coinciding with the 2014-2016 Marine Heat Wave (MHW). The most recent diver surveys were conducted in 2019. Both efforts showed little-to-no eelgrass present at the restoration site in Frenchy's Cove (Fig. 1). However, stable eelgrass meadows occur elsewhere around Anacapa Island and other Channel Islands, including in areas where fishing and boating activities occur. While the Special Closure, including the brown pelican fledgling area, was designed to protect sea birds around the island, at Frenchy's Cove the seabird protections also provide 10 months of ancillary eelgrass protection within waters less than 120 feet (~36.5 meters) deep in the brown pelican fledgling area and year-round ancillary eelgrass protection within waters less than 20 feet (~6 meters) deep. Although there is potential for impacts from bottom contact fishing gear and anchoring to occur during the two-month window when fishing is

allowed in the brown pelican fledging area (i.e., >20 feet deep November 1 – December 31), it is likely there are additional factors, including the 2014-2016 MHW, and site-specific attributes such as temperature, currents, and suitable substrate to sustain eelgrass, that are also contributing to the lack of recovery of eelgrass in Frenchy's Cove. Thus, prohibiting commercial lobster fishing in the Anacapa Island SMCA year-round (Option 1) is unlikely to address the petitioner's stated problem.

Another proposed option offered by the petitioner would extend the Special Closure depth limit to 98 feet (30 meters) to prohibit the deployment of lobster traps in water depths less than this limit (Option 3). Although the deepest observations of persistent eelgrass meadows around Anacapa Island have occurred at a maximum depth of about 45 feet (13.7 meters) (Engle and Miller 2005, Alstatt 2014, 2021, Sherman and DeBruyckere 2018), eelgrass around the Channel Islands typically occurs within shallower depths of 0 to 20 feet (~6 meters) (Engle and Miller 2005, Sherman and DeBruyckere 2018). Given the brown pelican fledgling area currently offers protection to eelgrass at Frenchy's Cove within the 120 foot (~36.5 meters) depth limit for 10 months out of the year and within the 20 foot (~6 meters) depth limit year round, it is unlikely that extending the island-wide Special Closure boundary to 98 feet (30 meters) would provide measurable benefits or protection to eelgrass in Frenchy's Cove beyond what the Special Closure and associated brown fledgling area already provide. The second option presented by the petitioner to prohibit hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows is inherently problematic for MPA regulations due to the dynamic nature of eelgrass and associated enforcement feasibility concerns.

CDFW also finds that the proposal's potential impacts to consumptive and non-consumptive users are anticipated to be significant, as the Anacapa Island SMCA continues to be an important fishing ground, especially for the recreational and commercial lobster fisheries and an important site for non-consumptive users (Fig. 2). The proposed option to extend the depth limit of the Special Closure into deeper waters would further restrict all access to Anacapa Island for all users and not just commercial lobster activities. Given the proposal is not expected to provide measurable benefits or enhanced protection for eelgrass in Frenchy's Cove, it would unnecessarily restrict an important area to consumptive and non-consumptive users that was carefully contemplated and deliberated during Northern Channel Islands MPA planning and implementation (MRWG n.d.). All proposed options deviate from the original intent of the Anacapa Island SMCA, which was to provide commercial and recreational fishing opportunities in lieu of a State Marine Reserve (SMR) at this location and to compensate for consumptive losses around the other Northern Channel Islands due to implementation of other SMRs (MRWG n.d., MLPA 2009).

RECOMMENDATION FOR 2023-27MPA_1_AM1

Given these considerations and the information in the evaluation below, **CDFW recommends the California Fish and Game Commission (CFGC) DENY petition 2023-MPA27**, including all three options proposed within **2023-27MPA_1_AM1** to "…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."

In lieu of a regulatory change to the MPA Network, CDFW recommends continued eelgrass research and monitoring at Frenchy's Cove and other areas where eelgrass persists around the Northern Channel Islands. This could provide more insight into the suite of drivers that may be impacting eelgrass persistence at this location and would better inform potential management actions. Although there is no quantitative evidence to support the presumption that bottom contact or fishing activities are the primary driver of eelgrass loss in this area, the installation of mooring buoys at Frenchy's Cove is an MPA adaptive management measure that has potential to address some of the petitioner's concerns at this site when it is accessible to boating activities, while also maintaining the MPA's intended goals.

The information below applies to the three options, and in certain cases, there is additional option-specific information.

EVALUATION QUESTIONS

2023-27MPA_1_AM1: Amend Anacapa Island SMCA or Special Closure with one of three options (see petition summary above for options) to best protect eelgrass meadows while allowing for community access.

QUESTION 1: DOES THE PROPOSED CHANGE SUPPORT THE MPA NETWORK IN MEETING ONE OR MORE OF THE MLPA GOALS AND ALIGN WITH MPA MASTER PLAN ADAPTIVE MANAGEMENT OBJECTIVES?

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

The petitioner asserts that amending the Anacapa Island SMCA or Special Closure regulations would better protect eelgrass meadows at Frenchy's Cove during the two-month window when the brown pelican fledgling area is open and that this proposed amendment is consistent with MLPA Goals/MPA Master Plan objectives 1, 2, 3, and 5, which are related to enhancing natural diversity, sustaining marine life populations, providing recreational, educational, and research opportunities, and ensuring science-informed management measures.

Although the petitioner asserts the proposed actions would align with the MLPA Goals and MPA Master Plan objectives, in the broader adaptive management framework, the proposed change would not advance management of the MPA Network.

Anacapa Island SMCA was designed with the goals of balancing ecosystem level biodiversity protections, recognizing the rich marine heritage that the marine waters around the Channel Islands provide, and maintaining important fisheries in a portion of state waters and the Channel Island National Marine Sanctuary (CINMS). These goals are aligned with MLPA Goals 2, 3, 4, and 5 and are still relevant today. Thus, the proposed change would offer no change in the design of the affected MPA for these goals.

CDFW recognizes the important role that eelgrass plays as a foundational species that enhances biodiversity (Duffy 2006, Nordlund et al. 2016, Sherman and Debruyckere 2018) (Goal 1) and the importance of protecting unique habitats such as eelgrass meadows (Goal 4). However, given the typical shallow distribution of eelgrass and many factors potentially influencing its persistence at this site, the proposed options for change in the Anacapa Island SMCA or Special Closure are unlikely to benefit eelgrass at Frenchy's Cove beyond what is currently offered by the Special Closure and brown pelican fledgling area.

Additionally, all the proposed options would conflict with the intended goal to maintain important fisheries (Goal 3). Given the data gaps that exist regarding the presence of eelgrass currently in Frenchy's Cove and the drivers contributing to its population dynamics, more work is needed to make a science-informed decision regarding the management of this species in this location (Goal 5).

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

No. The petitioner asserts that the proposed options would advance two prioritized DMR Recommendations #4: to apply what is learned from the DMR to support proposed changes to the MPA Network, and #9: to advance OPC's 2020-2025 Strategic Plan priorities specific to protecting and restoring eelgrass habitat in the state's coastal waters (OPC Strategic Plan Target 3.1.4). However, given the typical shallow depth

distribution of eelgrass and many factors potentially influencing its persistence in the area, the proposed options are unlikely to result in measurable, biologically meaningful benefits to eelgrass in Frenchy's Cove beyond what the Special Closure and brown pelican fledgling area currently offer. Thus, the proposed options in the petition would not advance management of the MPA Network. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

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

No. The proposed options in the petition would not address a current or emerging MPA management challenge. While the lack of eelgrass recovery at Frenchy's Cove is a concern, eelgrass restoration is not currently an MPA management challenge. It is important for any eelgrass restoration effort to implement intervention measures that address the site-specific ecological drivers of eelgrass loss, and there is insufficient evidence to support the assertion that bottom contact or fishing activities that are occurring in a two-month period annually is the primary driver contributing to eelgrass loss or lack of recovery in Frenchy's Cove.

CDFW recommends continued research and monitoring at Frenchy's Cove and other areas where eelgrass persists around the Northern Channel Islands. This could provide more insight into the suite of drivers that may be impacting eelgrass persistence at this location and would better inform potential management actions.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

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

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

Yes. The following is a list of tribes, agencies, and other entities that may be impacted by the proposed change.

National Oceanic and Atmosphere Administration (NOAA), CINMS: CINMS manages an MPA (Anacapa Island Federal Marine Conservation Area (FMCA)) in federal waters

directly adjacent to the state Anacapa Island SMCA. For reasons such as ease of enforcement, the federal and state MPAs around the Northern Channel Islands have the same regulations. This change would make the regulations inconsistent and CINMS and NOAA would need to pursue updating the federal regulations to end commercial lobster fishing in the federal Anacapa Island SMCA if CFGC chooses to grant Option 1. Furthermore, NOAA is the lead federal agency that administers the Marine Mammal Protection Act and CDFW shares jurisdiction of the Anacapa Island Special Closures. If CFGC chooses to grant the petition, CDFW would need to coordinate enforcement, updates to signage, and outreach efforts with CINMS.

National Park Service: CDFW shares jurisdiction of the Anacapa Special Closures with Channel Islands National Park and would need to coordinate enforcement, updates to signage, and outreach efforts.

State Water Resources Control Board and Regional Water Quality Control Board (Water Boards): The Anacapa Island MPAs all fall within an existing Area of Special Biological Significance. It is unclear whether the proposed change would have direct or indirect effects on the management activities of the Water Boards for these ASBS.

State Lands Commission (SLC): The Anacapa Island Special Closure overlaps with active SLC lease 8390 for the Anacapa Island boat dock. It is unclear whether the proposed change would have direct or indirect effects on SLC's regulatory or management activities.

Santa Ynez Band of Chumash Indians: There is a tribal exemption for the Anacapa Island SMCA for the Santa Ynez Band of Chumash Indians.

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

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

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

- Results from ongoing eelgrass monitoring at this site and other locations around the Channel Islands,
- Eelgrass mapping around Anacapa Island, including Frenchy's Cove (available through 2015) and additional diver survey data from 2019,

- Existing science and guidance pertaining to eelgrass recovery and restoration in California (including OPC's 2026-2030 Strategic Plan statewide targets for eelgrass restoration),
- Fishing block data for the commercial California spiny lobster fishery, and
- MLPA Initiative planning documents, historical documentation of the implementation of MPAs around the Northern Channel Islands, and other related information (e.g. MLPA Goals and MPA Master Plan adaptive management objectives).

The information provided in the petition, along with other information CDFW reviewed, did not demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

Without more definitive evidence of a place-based need linking eelgrass declines to specific drivers, including fishing and boating activities in Frenchy's Cove, it is unlikely the options presented in the petition would result in measurable, biologically meaningful benefits to eelgrass beyond what the Special Closure and brown pelican fledgling area currently provide.

CDFW will continue to work with tribes and other partners to identify priorities and critical data gaps to fill to better inform management actions to benefit eelgrass at this location and statewide.

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

No. CDFW has sufficient management information to proceed with the evaluation of this proposed change, including the foundational principles of the MLPA and information guiding management of MPAs and eelgrass.

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

No. Before the Northern Channel Islands MPA planning process, protections in this area were already in place in the form of an ecological reserve. During the Northern Channel Islands MPA planning process, the Anacapa Island Special Closure was intentionally designed to retain the existing regulations of the ecological reserve at the time and to serve a targeted conservation purpose beyond the broader protection of the MPA Network (MRWG n.d.). The Anacapa Island Special Closure, which prohibits setting nets and traps within 20 feet of shore around the island, was established primarily to protect feeding and roosting seabirds, including the California brown pelican.

Subsequently, during the MLPA Initiative planning process in the South Coast Region (MLPA 2009), and following CFGC guidance, this Special Closure was left unchanged.

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

No. DMR Recommendation 18 identifies the need to develop a framework to evaluate appropriate restoration and mitigation actions within MPAs, which could include eelgrass habitats that have been affected by anthropogenic and environmental factors. However, Recommendation 18 also stresses the need to align regional restoration and mitigation actions with a statewide framework, which has not yet been developed.

While our knowledge regarding the success of eelgrass restoration and the effects of climate change on eelgrass species has advanced since the implementation of the Northern Channel Islands MPAs (Ward and Beheshti 2023), there is a need for more recent eelgrass survey data around the islands, including Frenchy's Cove. CDFW recommends continued research and monitoring of eelgrass and the factors that could affect its persistence at Frenchy's Cove. Such efforts are more likely to inform appropriate management and restoration measures and have greater potential to be more effective in addressing the petitioner's stated problem than amending MPA regulations for the Anacapa Island SMCA or Special Closure.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. The proposed options do not align with the original intent of the Anacapa Island SMCA or Special Closure, which combined were intended to provide habitat protection for feeding and nesting birds, while allowing some level of recreational and commercial take, including the take of lobster, to continue.

The original intent of the Anacapa Island Special Closure, which prohibits the setting of nets or traps in waters less than 20 feet around the island, was to decrease entanglement risk for birds feeding near roosting grounds on the island. The original intent of the seasonal brown pelican fledgling area (Jan. 1-Oct. 31) within the Anacapa Island Special Closure and larger Anacapa Island SMCA was to provide protection from human disturbance to an important brown pelican rookery area when juvenile brown pelicans are fledging from their nesting sites. Although the original intent of the Special

Closure was not to protect eelgrass meadows, it offers protection to eelgrass in the shallow waters around Anacapa Island during the closure.

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?

The MLPA requires that the design of individual MPAs and the statewide Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The science guidelines developed by the Science Advisory Team and outlined in the Master Plan were created specifically to provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with these guidelines depends on LOP, which is determined by allowed take, and spatial configuration. More specifically, these guidelines require that an MPA must be at least 9 square miles and meet one of the three highest LOPs (i.e., Very High, High, or Moderate-high) to contribute to ecological goals such as habitat replication and representation.

Take of lobster and pelagic finfish are currently allowed in Anacapa Island SMCA, both of which are Moderate-low LOP activities. Under all three proposed options to protect eelgrass meadows, pelagic finfish take would remain allowed, meaning the level of protection would not increase. Since none of the options would increase the size or level of protection of the SMCA, implementation would not improve the design of the individual MPA or the MPA Network, nor would it enhance alignment with the MLPA Science Guidelines, and thus, does not warrant a change. See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context.

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

Option 1 (change Anacapa Island SMCA regulations to disallow commercial lobster fishing year-round):

Yes. This proposed change aligns with the Feasibility Guidelines, as it does not intend to change the spatial design of the MPA and simplifies the take regulations.

Option 2 (change Anacapa Island SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows):

No. The proposed change aligns with the Feasibility Guidelines, with the exception that it deviates from the MPA design guidance under “Multiple Zoning” to “avoid having areas split to allow for different uses in different portions of an MPA.” Furthermore, prohibiting the use of specific gear types near eelgrass meadows is not enforceable because the presence of eelgrass meadows can be highly variable and change over time.

Option 3 (change the border of Anacapa Island Special Closure, prohibiting the deployment of lobster traps from 0-30 meters (0-98.43 feet) instead of the existing 0-20 ft (0-6.1 meters) deep):

No. The proposed change does not align with the purpose of a special closure designation, which was intended during the MLPA Initiative planning process to be utilized to protect breeding seabirds and marine mammal populations from human disturbance. The Feasibility Guidelines advise that special closure restrictions should not be directly related to take of living marine resources, such as eelgrass. See Question 10a of Attachment 1 for CDFW Feasibility Guidelines.

> **QUESTION 10B:** IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?
>
> **No.** There is no rationale for moving forward with the proposed options and CDFW has not identified a feasible alternative that would meet the intent of the proposed options but better align with the Feasibility Guidelines.

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

Option 1 (change Anacapa Island SMCA regulations to disallow commercial lobster year-round):

Yes. The proposed action (i.e., disallowing the commercial take of lobster but retaining the recreational take allowance) has potential to increase enforceability by removing a method of take.

Option 2 (change Anacapa Island SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows):

No. The proposed action (i.e., change SMCA regulations to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows) is not enforceable as proposed. The location and extent of eelgrass meadows are not stationary and without specific boundaries, this option does not meet CDFW Feasibility Guidelines.

Option 3 (change the border of the Anacapa Island Special Closure, prohibiting the deployment of lobster traps from 0-30 meters (0-98.43 feet) instead of the existing 0-20 ft deep):

No. The proposed action (i.e., extend the existing [Anacapa Island Special Closure] prohibition of deployment of lobster traps less than 20 feet deep to apply out to 30 meters (0-98.43 feet)) would not meet CDFW Feasibility Guidelines, as depth contour boundaries are traditionally difficult to enforce.

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

No. The intent of the proposed change is not to simplify the regulatory language or enhance public understanding. However, the proposed change would change the intent of the MPA and have potential to make the regulatory language more complex. The existing regulations for Anacapa Island are already complex, and Options 2 and 3 would further complicate the regulations.

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

Yes. Option 1 (prohibiting commercial lobster fishing) may confer some extra protection for California spiny lobster, but none of the options are likely to offer meaningful protection to eelgrass as the proposal intends.

Although there is potential for impacts from bottom contact fishing gear and anchoring to occur in Frenchy's Cove during the two-month window when fishing is allowed in the brown pelican fledging area, it is likely there are other factors, including the 2014-2016 MHW, and site-specific attributes such as temperature, currents, and suitable substrate to sustain eelgrass, that are contributing to the lack of recovery of eelgrass in Frenchy's Cove. Thus, prohibiting commercial lobster fishing in the Anacapa Island SMCA year-round (Option 1) is unlikely to enhance protection of eelgrass within Frenchy's Cove.

Additionally, although the deepest observations of persistent eelgrass meadows around Anacapa Island have occurred at a maximum depth of about 45 feet (13.7 meters) (Engle and Miller 2005, Alstatt 2014, 2021, Sherman and DeBruyckere 2018), eelgrass typically occurs within shallower depths of 0 to 20 feet (0-6 meters) (Engle and Miller 2005, Sherman and DeBruyckere 2018). Given the brown pelican fledgling area currently offers protection to eelgrass at Frenchy's Cove within the 120 foot (~36.5 meters) depth limit for 10 months out of the year and within the 20 foot (~6 meters) depth year round, it is unlikely that extending the island-wide Special Closure boundary to 98 feet (~30 meters) would provide measurable benefits or protection to any remaining eelgrass in Frenchy's Cove beyond what the Special Closure and brown pelican fledgling area currently provide.

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

See Question 14 of Attachment 1.

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

Yes. Significant impacts to the commercial lobster fishery would be expected. The affected MPA overlaps with CDFW fishing block 684, and commercial landings data indicate this fishing block is highly valuable to the commercial California spiny lobster fleet (Fig. 2).

Given the proposed change is not expected to provide measurable benefits or enhanced protection to any remaining eelgrass in Frenchy's Cove, it would unnecessarily restrict an important fishing ground that was carefully contemplated and deliberated during Northern Channel Islands MPA planning and implementation.

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

See Question 16 of Attachment 1.

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

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

- Channel Islands Harbor (Oxnard) (~15 nautical miles (nm) away from area of proposed change),
- Ventura Harbor (~10 nm away from area of proposed change), and/or
- Santa Barbara (~25 nm away from area of proposed change).

The three options proposed by the petitioner would have differing impacts on fishing in this area. It is unclear to what degree it would constrain access for the commercial lobster fleet homeported in the Santa Barbara fishing community, where the commercial lobster trapping fleet represents the second-highest valued homeported fishery.

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

Yes. This petition has the potential to interact with proposed changes in petition 2023-18MPA (proposed actions_6, 7) that aim to reduce the size of the brown pelican fledgling area within the Anacapa Island Special Closure to allow year-round boat access to Frenchy's Cove and to consider abolishing the Anacapa Island Special Closure around the full extent of the island.

This petition also has the potential to interact with petition 2023-14MPA (proposed action_6), which aims to allow commercial take of urchin in the Anacapa Island SMCA.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

TABLES AND FIGURES

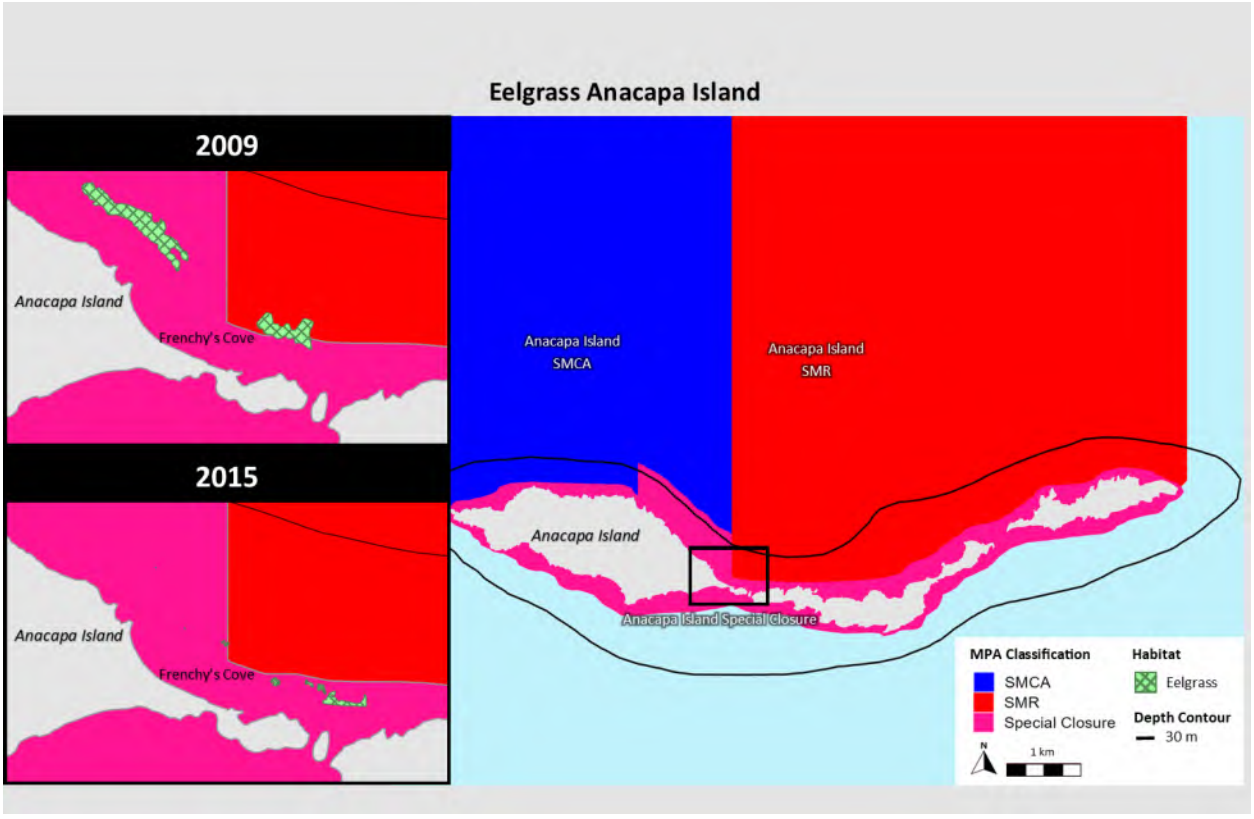

Figure 1. Eelgrass habitat maps in Frenchy's Cove on Anacapa Island, Northern Channel Islands in 2009 and 2015. These are the most recent years that coordinated eelgrass mapping surveys occurred around Anacapa Island. Eelgrass extent is depicted in green crosshatching. The Anacapa Island SMCA (blue) and SMR (red) do extend to the mean

high tide line, however, overlap with the full island Special Closure (out to 20 foot depth) and the seasonal brown pelican fledgling Special Closure in Frenchy's Cove that extends out to 120 foot depth annually January 1-October 31 (Special Closures shown in pink).

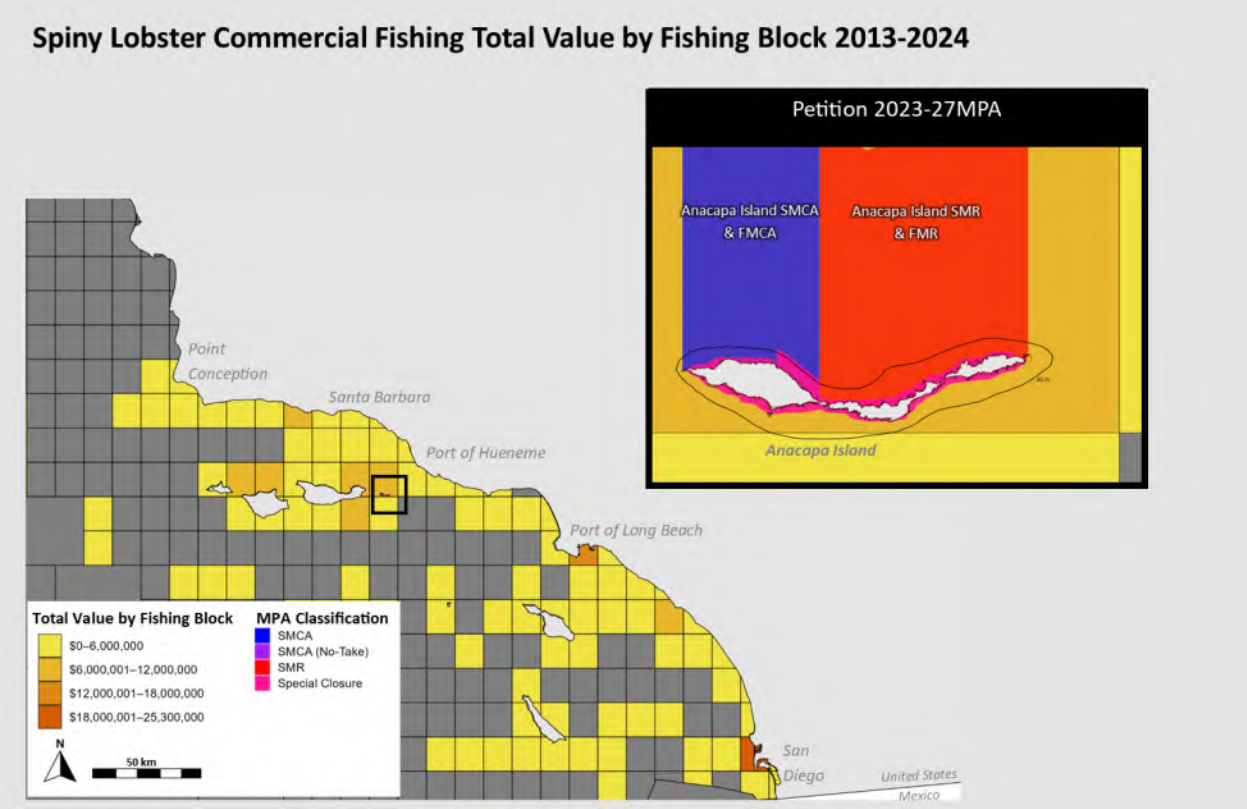

Figure 2. Total value (in millions $US) of commercially caught California spiny lobster (*Panulirus interruptus*) from 2013 to 2024 by California Department of Fish and Wildlife fishing block for the South Coast Bioregion. Actual value provided within fishing blocks that overlap with Anacapa Island SMCA and Special Closures, and the area referenced in petition 2023-27MPA.

CITATIONS

Alstatt, J. 2003. Restoration of a historic eelgrass (*Zostera marina*) bed at Frenchy's Cove, Anacapa Island. Proceedings of the sixth Channel Islands Symposium. National Park Service Technical Publication.

Alstatt, J. 2021. Island eelgrass (*Zostera pacifica*): Focused assessment of condition, health, and extent of beds and biological monitoring of associated fish and invertebrate communities.

Alstatt, J., R. Ambrose, J. Carroll, J. Coyer, J. Wible, J. Engle. 2014. Eelgrass meadows return to Frenchy's Cove, Anacapa Island: Recovery ten years after successful transplantation. Monographs of the Western North American Naturalists 7:500-517.

DuBois, K., K.N. Pollard, B.J. Kauffman, S.L. Williams, J.J. Stachowicz. 2022. Local adaptation in a marine foundation species: Implications for resilience to future global change. Global Change Biology 28:2596-2610.

Duffy J.E. 2006. Biodiversity and the functioning of seagrass ecosystems. Marine Ecology Progress Series 311:233-250.

Engle, J., K.A. Miller. 2005. Distribution and morphology of eelgrass (*Zostera marina)* at the California Channel Islands. Pages 405-414 om D.K. Garcelon and C.A. Schwemm, editors, Proceedings of the Sixth California Islands Symposium. Institute of Wildlife Studies, Arcata, CA.

Frederiksen, M., D. Krause-Jensen, M. Holmer, J.S. Laursen. 2004. Spatial and temporal variation in eelgrass (*Zostera marina*) landscapes: influence of physical setting. Aquatic Biology 78(2):147-165.

Krumhansl K.A., M. Dowd, M.C. Wong. 2021. Multiple metrics of temperature, light, and water motion drive gradients in eelgrass productivity and resilience. Frontiers in Marine Science 8:597707.

Livingston, R.J. 1984. The relationship of physical factors and biological response in coastal seagrass meadows. Estuaries and Coasts 7:377-390.

Marine Life Protection Act Initiative (MLPA). 2009. South Coast Planning Process Intent: California Marine Life Protection Act Initiative MLPA Blue Ribbon Task Force Motion for an Integrated Preferred Alternative as Adopted as November 10, 2009 Meeting Document revised November 20, 2009. South Coast MPA Integrated Preferred Alternative Narrative and Descriptive Tables

Marine Reserves Working Group (MRWG). n.d. History of the Channel Islands Marine Reserves Working Group Process.

Nordlund L.M., E.W. Koch, E.B. Barbier, J.C. Creed. 2016. Seagrass ecosystem services and their variability across genera and geographical regions. PLOS ONE 12(1): e0169942.

Sherman K., L.A. DeBruyckere. 2018. Eelgrass habitats on the U.S. West Coast. State of the knowledge of eelgrass ecosystem services and eelgrass extent. A publication prepared by the Pacific Marine and Estuarine Fish Habitat Partnership for the Nature Conservancy.

Ward, M., K, Beheshti. 2023. Lessons learned from over thirty years of eelgrass restoration on the US West Coast. Ecosphere 14:e4642.

Ventura County Commercial Fishermen's Association
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(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 2023-27MPA – Anacapa Island SMCA Proposed Changes**

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 2023-27MPA, which proposes reclassifying the Anacapa Island State Marine Conservation Area (SMCA) or further restricting access to protect eelgrass habitat.

While we recognize the importance of protecting sensitive habitats such as eelgrass, our primary concern is 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 proposes eliminating or significantly restricting commercial lobster fishing and gear use within the Anacapa SMCA, including prohibiting lobster trapping and anchoring in key areas. However, it does not adequately address what happens to the fishing effort currently operating in these areas.

Fishing effort does not disappear—it is **displaced**.

For Ventura and Santa Barbara-based fleets, this displaced effort will be redistributed into already constrained fishing grounds, including areas around the Northern Channel Islands and mainland

coastal waters. This is especially significant given the cumulative effect of existing closures throughout the region.

As access continues to be reduced, fishermen targeting:

- Commercial lobster
- Sea urchin
- Crab
- Nearshore and offshore finfish

are forced into a smaller footprint of available fishing grounds.

This results in:

- Increased competition among fishermen
- Crowding of productive fishing areas
- Increased gear conflict, particularly in trap and dive fisheries
- Reduced efficiency and higher operational costs
- Increased localized pressure on marine resources in open areas

These are **real and measurable socioeconomic impacts**, yet the petition does not meaningfully analyze or quantify them.

Additionally, while the petition acknowledges that there may be **short-term impacts to commercial fishing**, it suggests these would be offset by long-term ecological benefits without providing a detailed or regionally relevant economic analysis.

There is little to no evaluation of:

- The direct economic impact on commercial fishing operations
- The cumulative effect of additional restrictions in an already highly managed region
- Impacts to shoreside infrastructure such as processors, buyers, and marine service providers
- The broader coastal economy supported by these fisheries

Furthermore, this petition does not consider the interconnected nature of fishing grounds throughout the Channel Islands region. Restrictions at Anacapa Island contribute to a **cumulative compression of effort**, which is compounded by other closures and proposals throughout the region—including areas such as Santa Rosa Island.

Without a thorough analysis of effort displacement and regional economic consequences, the conclusion that impacts are minimal or acceptable is incomplete.

For these reasons, VCCFA respectfully urges the Commission to carefully consider these deficiencies before moving forward with Petition 2023-27MPA. At a minimum, we recommend:

1. A comprehensive socioeconomic analysis reflecting real-world fishing patterns
2. A detailed evaluation of effort displacement and impacts to open areas
3. A full economic impact assessment on lobster, sea urchin, crab, and finfish fisheries
4. Consideration of cumulative impacts across the Channel Islands and mainland fishing grounds

We appreciate the Commission's efforts in reviewing these complex 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
Ventura County Commercial Fishermen's Association (VCCFA)

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

Tracking Number: (__2023-14MPA_)

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: David Goldenberg, Executive Director, California Sea Urchin Commission
Address:
Telephone number:
Email address:

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested: Authority: 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) - Summarize the proposed changes to regulations: Allow the commercial take of urchins in the following State Marine Conservation Areas (SMCAs):

1) Sea Lion Cove SMCA
2) Stewart's 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 SMCA
9) Swami's SMCA

4. Rationale (Required) - Describe the problem and the reason for the proposed change: .
The commercial urchin fishery and the resiliency of California's kelp forests have been identified as being at risk due to climate change. This became a reality with the warm water event that started in 2014 and led to urchin barrens and a decline in kelp forests along the California coast, with declines

in kelp as high as 90% along the north coast. This resulted in a catastrophic decline in urchin landings (4.2 million pounds in 2013 down to 284,000 pounds in 2022), leading to a federal fishery disaster declaration. Allowing commercial urchin fishing within the listed SMCAs will improve the sustainability of the urchin industry and may also support kelp recovery efforts endorsed by the Fish and Game Commission (FGC), Department of Fish and Wildlife (DFW), and the Ocean Protection Council (OPC).

This proposal is consistent with goals and objectives 1.1, 1.5, 2.4, and 5.1 identified in the 2016 Master Plan for Marine Protected Areas (MPA), along with the identified design considerations relative to climate change impacts and preservation of diverse commercial uses. Managed urchin fishing can promote the stability of species diversity and abundance consistent with natural fluctuations in environmental conditions. We believe that commercial urchin fishing can help the recovery of kelp ecosystems impacted by over-abundant urchin populations (urchin barrens) ultimately caused by climate change. This belief is based on the kelp restoration projects funded by the OPC along the north coast that are showing promise. Our petition sets up an economical approach that can be used to expand this effort in selected SMCAs along the entire coastline.

Our proposal is consistent with the Master Plan by protecting habitats (kelp forests) while allowing commercial harvest, thus mitigating some of the significant negative impacts experienced by the fishery when the MPA network was established. The Master Plan also states that the MPA network should consider several factors, including the potential impacts of climate change and the diversity of commercial fishing. The proposal is also consistent with the comprehensive recommendations and science guidelines of DFW's Decadal Management Review, which acknowledged inadequate engagement with the fishing industry and the continuing need for adaptive management under a changing climate. DFW's JEDI Governance recommendation #6(c) clearly states the need to explore innovative approaches to engage the fishing industry in MPA research and management. The industry believes that with the collaboration of CDFW, FGC, OPC, NGO's, academic institutions, and the Tribes it can help address urchin barrens and ultimately restore kelp forests the ecosystems reliant upon them.

Our proposal is supported at the Sea Lion Cove and Double Cone Rock SMCAs by the MPA Collaborative recommendations. The Collaborative also supports continuing the commercial urchin harvest at Saunders Reef SMCA.

The commercial urchin fishery has a long track record of working with DFW, and in recent years with OPC, on research and management issues and is ready to continue that partnership using the recommended changes to the MPA network listed in this petition as an important step in fulfilling the goals of the Marine Life Protection Act and mandates in the Fish and Game Code to support sustainable commercial fisheries.

The science developed to date indicates that in areas lacking significant urchin predators, urchin populations can have negative cascading effects on kelp forests in MPAs and reference sites (Carr et.al., 2021). By functioning as predators, commercial urchin fishermen may help restore and protect kelp forests in MPAs. In accordance with the adaptive management elements of the Master Plan, decadal review, and DFW recommendations, we ask that this petition be collaboratively evaluated by all stakeholders through the rulemaking process of the FGC with respect to improving the resiliency of both the commercial urchin fishery and kelp forests to climate change.

SECTION II: Optional Information

5. Date of Petition: Click here to enter text.

6. Category of Proposed Change

☐ Sport Fishing
☒ Commercial Fishing
☐ Hunting
☐ Other, please specify: Click here to enter text.

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

☒ Amend Title 14 Section(s): 632(b)(30)(B) …is allowed. The commercial take of urchins is allowed.

632(b)(16)(B)2…; ~~and~~ Dungeness…~~is allowed.~~, and the commercial take of urchins is allowed.
632(b)(33)(B)...dip net. The commercial take of urchins is allowed.
632(b)(35)(B) … is allowed. The commercial take of urchins is allowed.
632(b)(98)(B) … 5. The commercial take of urchins is allowed.
632(b)(112)(B)1 …commercial take of spiny lobster and urchins is allowed.
632(b)(117)(B)2 …take of urchins; swordfish…
632(b)(119)(B) …is allowed. The commercial take of urchins is allowed.
632(b)(138)(B) … 4. The commercial take of urchins is allowed.

☐ Add New Title 14 Section(s): Click here to enter text.
☒ Repeal Title 14 Section(s):

8. If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition 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: 2025

10. Supporting documentation: Identify and attach to the petition any information supporting the proposal including data, reports and other documents: Red Sea Urchin Enhanced Status Report (See California Department of Fish and Game website). California Marine Life Protection Act Master Plan for Marine Protected Areas 2016 (See California Department of Fish and Game website). California's Marine Protected Area Network Decadal Management Review 2022 (See California Department of Fish and Game website). Monitoring and Evaluation of Kelp Forest ecosystems in the MLPA Marine Protected Area Network (Carr et.al. 2021) (See California Department of Fish and Game website). MPA Collaborative Network (see website, Collaborative Vetted Regulation Recommendations)

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: No known negative economic or fiscal impacts of the proposed changes. It is expected that there will be some positive economic benefits by opening formally closed areas to commercial urchin fishing.

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: 11/13/23.

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

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-14MPA

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.

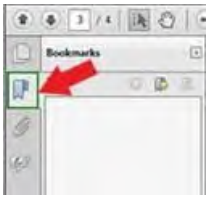
Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in 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

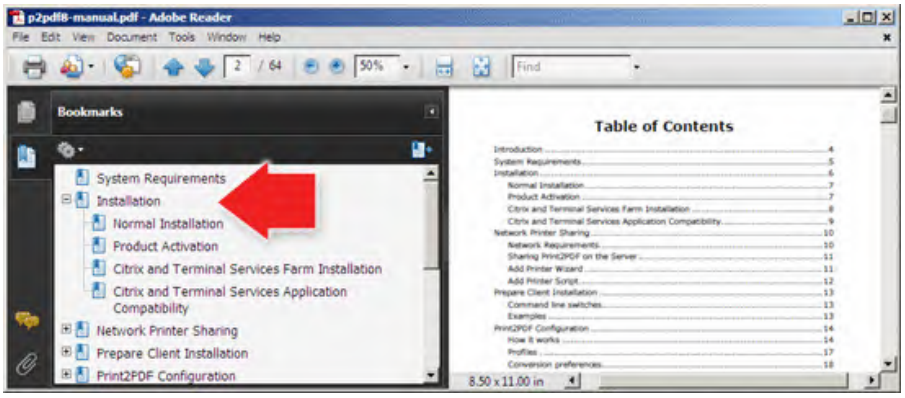
EASY GUIDE TO USING THE PACKET

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.



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: 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

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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2024-02-09 00:14:18.207		Vincent	Doyle						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			Kuna	ID		US	Petition Signed
2024-02-02 14:02:35.91		Jordan	Germyn						US	Petition Signed
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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			Carmel	CA		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

From: Emily Parker <[redacted]>
Sent: Friday, July 5, 2024 04:41 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Public Comment on FGC MRC July Agenda Item #2

Good Afternoon,

Please accept the attached letter as public comment from NGOs on the Fish and Game Commission Marine Resources Committee July Meeting Agenda Item #2: Marine protected area (MPA) regulation change petitions evaluation process. Please feel free to reach out with any questions.

Best,
Emily

Heal the Bay

EMILY PARKER | COASTAL AND MARINE SCIENTIST
She/Her/Hers (What does this mean?)
Heal the Bay
1444 9th Street
Santa Monica, CA 90401
[redacted]

July 5, 2024

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

Submitted electronically via fgc@fgc.ca.gov

RE: Comments on Fish and Game Commission July 17-18, 2024 Marine Resources Committee Agenda Item 2 - MPA Petition Review Process

Dear President Murray and Honorable Commissioners:

The undersigned organizations are dedicated to ocean protection in California and have decades of combined experience in marine protected area (MPA) management, research, compliance, education, and outreach. We applaud the Fish and Game Commission's (FGC) commitment to meeting the goals of the Marine Life Protection Act (MLPA) through support of the Marine Protected Area (MPA) Network, including adaptive management as part of the decadal management review. As the FGC and California Department of Fish and Wildlife (CDFW) begin evaluating petitions to modify California's MPA Network, our organizations respectfully offer the following comments on agenda item 2 (Marine protected area (MPA) regulation change petitions evaluation process) of the July 17-18 Marine Resources Committee meeting.

Support for the Petition Binning Outcome and Transparent Process

We would like to first extend our sincere gratitude to CDFW staff for publishing the draft binning document far in advance of the July MRC meeting. Access to materials far in advance supports public engagement and promotes equity by allowing ample time for review and preparation. We appreciate the transparency in presenting the justifications for the Bin 1 petitions as well as the initial assessment of the Bin 2 petitions. This openness is crucial for maintaining public trust and ensuring that all stakeholders have a clear understanding of the decision-making process. Overall, we are in general agreement with the current binning outcomes for the MPA petitions. The criteria used to classify the petitions are thorough and well-founded. Specifically, we support the inclusion of certain Bin 1 petitions that align with the objectives of the MLPA and the goals of maintaining and enhancing marine protections across the Network.

Petition Evaluation Must be Rooted in Science

We firmly believe that the scientific merit of a petition should be the primary factor in its evaluation, regardless of whether the petition is considered controversial. As both CDFW and FGC have previously emphasized, modifications to the network should be scientifically driven. We are wary of using controversy as a key metric for evaluating petitions and urge that the weight of this particular criterion be reconsidered and that the focus of petition evaluation be concentrated on scientific rigor and broad community engagement. It is essential that modifications to the MPA Network are grounded in robust scientific evaluation and driven by data that reflect the current and anticipated future conditions of our oceans. This will require consideration of both local and regionally relevant data and forecasts. Equally important is the incorporation of community input, as local stakeholders offer invaluable perspectives and knowledge that can enhance the effectiveness and acceptance of management decisions.

As we have stated in prior communication, **our organizations strongly oppose any proposals that would weaken the MPA Network** including: 1) Petition 2023-14MPA by David Goldberg of the California Sea Urchin Commission to llow to allow commercial take of sea urchins in 9 SMCAs, 2) Petition 2023-15MPA by Blake Hermann to reclassify three SMRs in the northern Channel Islands, Santa Barbara County, as SMCAs and allow either the limited take of highly migratory species and possession of coastal pelagic species, or allow the take of pelagic finfish, and 3) Petition 2023-16MPA by Richard Ogg to reclassify Stewarts Point and Bodega Head SMRs and SMCAs to allow commercial take of salmon by trolling.

Petitions that would result in a net loss of protection should not be considered, as they contradict the foundational principles of the MLPA. Given the limited time and resources available for the adaptive management process, it is essential to prioritize petitions that strengthen or maintain the network rather than those that would undermine it. We would like to affirm statements made by President Murray and Commissioner Sklar during previous FGC MRC meetings regarding the policy direction of ensuring no net weakening of the MPA Network as a result of this petition process.

Petition Evaluation Must be Prompt and Consider Numerous Threats

The adaptive management process must consider historical, scientific, and future contexts. While historical context is important, it is critical to acknowledge that our oceans are undergoing significant changes and to acknowledge the communities absent from the initial implementation of the MLPA. Adapting to these changes and including diverse voices is critical and consistent with the goals of the MLPA. From a scientific perspective, petition evaluation must account for numerous threats to ocean health, particularly the climate crisis. Rising ocean temperatures, acidification, and other climate-related threats are putting unprecedented pressure on our marine ecosystems. Due to these pressing and immediate stressors, we need to examine the current network with respect to its resilience to climate change and ensure that changes to its design help to enhance both climate and ecological resilience. It would also be prudent to move forward with necessary adaptive management changes within a reasonable time frame. **We urge CDFW to complete the Bin 1 review promptly and proceed to the evaluation of Bin 2 petitions without delay.**

Questions for the Marine Resources Committee

We have several questions that may need further discussion outside this letter but are critical for understanding the overall petition evaluation process:

- What does obtaining additional policy guidance entail?
- How would clarification from petitioners help inform the decision-making process?
- While we recognize that Bin 1 petitions are those that can be evaluated in the near term and meet specific criteria, it appears that only petitions likely to be approved were included. Why were certain petitions that could be simple denials not included in Bin 1?
- When will updates be provided regarding the information gathered about Bin 2 petitions?
- What is the timeline for decisions on Bin 1 petitions?

In conclusion, we once again stress the urgency of completing the Bin 1 petition review and moving forward to the Bin 2 petition evaluation. The health of our marine environments cannot afford delays. We sincerely thank the FGC and CDFW for their continued dedication to the protection and management of California's MPA Network. The adaptive management of our MPAs is more critical than ever, especially in the face of the escalating climate crisis. Adaptive management allows us to respond to these changes in real-time, ensuring that our MPAs can continue to provide vital ecological, economic, and social benefits. We again thank you for this opportunity to comment and look forward to discussing the MPA petition binning outcomes at the upcoming July MRC meeting.

Sincerely,

Emily Parker
Coastal and Marine Scientist
Heal the Bay

Rikki Eriksen, PhD
Marine Spatial Ecologist
California Marine Sanctuary Foundation

Laura Deehan
State Director
Environment California

Angela Kemsley
Director of Conservation Impact
WILDCOAST

Ashley Eagle-Gibbs, Esq.
Executive Director
Environmental Action Committee of West Marin

Sandy Aylesworth
Director, Pacific Initiative
Natural Resources Defense Council

Anupa Asokan
Founder and Director
Fish On

Tomas Valadez
CA Policy Associate
Azul

Ray Hiemstra
Associate Director
Orange County Coastkeeper

Laura Walsh
California Policy Manager
Surfrider Foundation

July 31, 2025

Erika Zavaleta
California Natural Resources Headquarters Building
715 P Street, 2nd Floor
Sacramento, CA 95814

Re: **Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA**

Dear President Zavaleta and Honorable Commissioners:

We would like to begin by thanking the Marine Resource Committee, the full Fish and Game Commission (FGC) and California Department of Fish and Wildlife (CDFW) for their dedication to the adaptive management process of California's MPA network. As the FGC and CDFW continue reviewing the Marine Protected Area (MPA) petitions, we ask that you consider the below arguments against specific petitions looking to weaken the MPA network. Specifically, the requests of petition 2023-14 MPA to open nine MPAs along the coast to commercial urchin fishing and petition 2023-15 MPA to allow some form of take of highly

migratory species, coastal pelagic species, and/or pelagic finfish at three MPAs at the Channel Islands.

I. The FGC and CDFW Should Reject PETITION 2023-14MPA- Opening Sea Urchin Harvest to Commercial Fishermen Within Existing Marine Protected Areas.

The decline of kelp forest ecosystem is due to many factors, including a significant increase in purple urchins, which leads to urchin barrens where vibrant kelp forests once existed. Petition 2023-14 MPA requests that nine existing MPAs from the North to the South Coast be opened for commercial urchin fishing for economic reasons. We request that the FGC and CDFW reject this petition to open multiple State Marine Conservation Areas (SMCAs) (Double Cone Rock SMCA, Sea Lion Cove SMCA, Stewart's Point SMCA, Salt Point SMCA, Naples SMCA, Anacapa Island SMCA, Point Dume SMCA, Point Vicente SMCA (no-take), Swami's SMCA) to allow commercial take of sea urchins to aid in kelp forest restoration. First, any benefits of this petition are outweighed by the considerable costs to the MPA goals and environment of allowing commercial urchin fishing in MPAs. Second, the lack of clarity by the petitioner as to which species of urchin would be commercially fished is concerning. Third, using SeaSketch to determine habitat connectivity under the petitioners' request would see the loss in connectivity in multiple habitats.

A. Benefits and Cost Synthesis

The benefits and costs of harvesting sea urchins within MPAs in California are complex, involving ecological, economic, and management trade-offs. Here is a synthesis of key points.

1) **Scientific Disagreement and Uncertainty**: The trophic dynamics of predator-prey relationships for urchins within California are poorly understood and vary region to region. In Northern California, where purple urchin overpopulation has devastated kelp forests (creating "urchin barrens"), targeted harvesting has been used to aid kelp recovery. Projects like the Giant Kelp Restoration Project involved culling urchins, which allowed kelp to regrow in some areas. However, this project was highly restricted and regulated to minimize damage to the ecosystem while targeting the purple urchin using trained divers. The challenges and importance of regulating harvest within MPAs have been researched in the Mediterranean, with similar findings for the need to restrict and oversee any management interventions such as this.[1]
2) **Ecological Disruption**: MPAs are designed to protect trophic cascades, where predators (e.g., lobsters, sheephead, sea otters) control urchin populations, indirectly safeguarding kelp forests. Harvesting urchins—or their predators—can disrupt this balance, leading to kelp loss and habitat degradation. Currently, within California there is scientific uncertainty about the conditions under which urchin harvest will benefit or harm the marine ecosystem.[2]

[1] https://peerj.com/articles/12971/
[2] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/; https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2022.987242/full

3) **Undermines MPA Goals:** Studies in Sardinia found that allowing urchin harvest in MPAs led to population declines, especially where natural predation was already high. Restricted harvest sites, which were highly managed and restricted, had the lowest urchin densities, suggesting cumulative pressures harm recovery.[3] Prohibiting any type of harvest – including sea urchins- has been effective in California.[4]
4) **Short term economic gains over long term ecosystem protection:** The rationale for the petition is rooted in the desire of commercial fishermen- primarily in Southern California- who want to harvest sea urchins arguing that MPAs cause economic hardship. MPAs were established to prioritize biodiversity over short-term fisheries gains, as kelp forests support hundreds of species and mitigate climate impacts.[5] The long-term benefits from protection far exceed short term loss for a handful of fishermen, MPAs are not just conservation tools—they are **investments in sustainable fisheries.**

B. The Petition is Not Supported and Does Not Specify Which Species of Urchin is Included

As the petition reads, the take allowance is for ALL allowed sea urchin species and does not make the distinction of which species would be targeted to benefit kelp forests. According to CDFW, three sea urchin species have been the main species landed across the state. The red, purple, and white sea urchin are the primary species historically caught in California waters, with red urchins being the dominant species caught and sold (Table 1). From January 31, 1980, to December 31, 2024, the total purple urchin landings out of all sea urchin landings (Table 1) accounted for less than one percent of the total catch. The petitioner does not indicate if the allowance for commercial take of sea urchins would be for a specific species or all.

Species Name	Pounds	Value
Sea urchin, red	774,479,211	$429,008,941
Sea urchin, purple	2,043,647	$2,928,395
Sea urchin, white	53,647	$207,324
Total	776,576,511	$432,144,719

Table 1. Sea Urchins landed from January 31, 1980, to December 31, 2024.

It is our understanding that much of the commercial urchin fishery is focused on red urchins (Table 1), but it is the abundance of purple urchins that has contributed to the kelp decline[6] cited in the petition. Paired with the lack of a commercial market for purple urchin, sea urchins collected from barren areas are unlikely to meet the quality standards to be commercially viable. The petitioner's argument for opening the forementioned MPAs to be sustainable

[3] https://pmc.ncbi.nlm.nih.gov/articles/PMC8908888/
[4] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/
[5] https://caseagrant.ucsd.edu/news/examining-climate-wins-marine-protected-areas
[6] Smith, J. G., et al. (2021). Behavioral responses across a mosaic of ecosystem states restructure a sea otter–urchin trophic cascade. *Proceedings of the National Academy of Sciences*, *118*(11), e2012493118.

additions to the commercial fishery is not supported. Additionally, the petitioners did not provide any supporting data for the claim that these nine MPAs have had a significant negative impact on the urchin fishery, nor data on urchin abundance within these MPAs that could be used to do a cost-benefit analysis.

Urchin culling is one method that has had small trials along the California coast to determine effectiveness of direct removal on improving kelp forest density. It was named as a potential tool in the 2022 report "Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach."[7] However, the report also found that scaling up this process would face challenges. Specifically, the costs to go to the sites and remove the urchins would be, "most effective in areas where there is already an established commercial red urchin fishing fleet"[8] Additionally, the report indicates that reducing and **maintaining** low urchin levels is imperative to maintain kelp ecosystem recovery. The long-term socio-economic effectiveness of urchin culling is low, as the costs to start and continue removal efforts increase the further the site is from shore and/or a red urchin port, as well as the lack of viable commercial purple urchin that live inside urchin barrens. It is difficult to say whether opening identified MPAs in this petition would benefit the commercial purple or red urchin fishery.

C. Habitat Connectivity

We utilized the data layers on the recently released tool via SeaSketch to see which habitats will lose connectivity based on the petitioners desired changes to the MPA Network. Of the listed MPAs, Point Dune SMCA, Swamis SMCA, and Point Vicente SMCA would no longer have adequate protections to maintain habitat connectivity for beach, rock, kelp, and soft substrate (0-30m) habitat. The other six MPAs do not have a high enough level of protection to count towards the habitat spacing report.

Accordingly, the petition should be rejected.

II. The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.

This petition requests opening existing no take reserves—the cornerstone of the MPA Network—to commercial fishing for pelagic species, which encompasses a wide range of species,[9] such as sharks, bill fish, tuna, and mahi mahi in Southern California. The Channel Islands State Marine Reserves (SMRs), and Federal Marine Reserves (FMRs) are among the biggest, oldest and most effective MPAs in the country. Petition 2023-15MPA does not support the goals identified during the planning process for the Channel Islands MPAs, and we therefore request that the FGC and CDFW reject the petition to reclassify three SMRs (Footprint SMR,

[7] https://www.reefcheck.org/wp-content/uploads/2022/06/Restoration-of-Northern-Californa-bull-kelp-RCF-final-report-to-OPC.pdf
[8] Ward, M., et al. Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach. Reef Check Foundation, Marina del Rey, CA, April 2022.
[9] https://www.ecfr.gov/current/title-50/chapter-VI/part-660/subpart-K

Gull Island SMR, Santa Barbara Island SMR) in the Northern Channel Islands (NCIs) as SMCAs.

Established in 2003 after the Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC), the Marine Reserves Working Group (MRWG) came up with goals for MPAs at the Channel Islands. The MRWG's goals stated the following:

> (1) Ecosystem Biodiversity Goal: To protect representative and unique marine habitats, ecological processes, and populations of interest; (2) Socio-Economic Goal: To maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties; (3) Sustainable Fisheries Goal: To achieve sustainable fisheries by integrating marine reserves into fisheries management; (4) Natural and Cultural Heritage Goal: To maintain areas for visitor, spiritual, and recreational opportunities which include cultural and ecological features and their associated values; and (5) Education Goal: To foster stewardship of the marine environment by providing educational opportunities to increase awareness and encourage responsible use of resources.[10]

We utilized the goals and reasonings from the "Final 2002 Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary" as the Channel Islands state and federal MPAs pre-date the Marine Life Protection Act and subsequent establishment of the statewide MPA network. Approval of this petition would be inconsistent with these goals for the following reasons.

A. MRWG Goal - **Ecosystem Biodiversity**

The establishment of the Channel Islands MPAs was, "To protect representative and unique marine habitats, ecological processes, and populations of interest," which has translated to the goals and intent of the statewide MPA Network. Past petitions requesting to establish MPAs to protect a singular species have been denied by the FGC. For example, in 2020-2021 the FGC denied a petition requesting for the creation of an MPA for White Sharks near Carpentaria reasoning, "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species."[11] The intent of California MPAs remains to protect all aspects of an ecosystem (ecosystem-wide protection), not one species. Consequently, opening an MPA for one species should also be rejected.

The petitioner makes the argument that opening Footprint SMR, Gull Island SMR, Santa Barbara Island SMR to fishing pressure would have no significant impact on non-migratory species within the MPAs. However, the increase in boat traffic through the previously closed areas would introduce noise pollution, potential derelict fishing gear, water pollution, etc. The

[10] 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).
[11] California Department of Fish and Wildlife (2022). Decadal Management Review: Appendix G Supplemental Tables.

added complexities in the individual MPAs regulations will also increase the hardship on enforcement. Additionally, the same reasons cited to open these MPAs to highly migratory species are also the reasons why we believe it is unnecessary to do so.

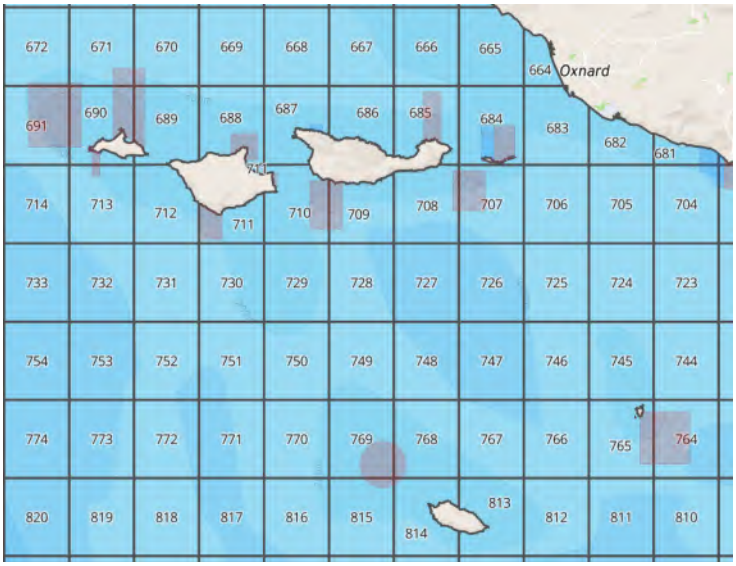

Figure 1. Seasketch Map using layers "Commercial Fishing Blocks" and "Existing Marine Protected Areas (MPAs)"

1. Reasons Why MPAs Protect Highly Migratory Species

Protecting highly migratory species (HMS) like tunas, sharks, and billfish in California waters plays a critical role in maintaining healthy marine ecosystems through trophic cascades, nutrient cycling, and habitat connectivity.

Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition.[12] A sharp decline of large pelagic fish (species such as sharks, swordfishes, marlins, and tuna) that roam the open sea and play vital roles as predators leads to impacts on local, regional and large-scale ecosystem dynamics. Fishing undermines MPA effectiveness which leads to target species depletion, leading to their inability to recover even within MPAs. The risk of bycatch on unintended species is high and unaccounted for, leading to ineffectiveness of the local MPA for all other components of the ecosystem.

2. Maintaining Trophic Balance (Top-Down Control)

- **Predator-prey dynamics:** HMS like bluefin tuna, mako sharks, and swordfish are apex predators that regulate mid-level species (e.g., squid, small fish). Their decline can trigger population explosions of prey species, disrupting food webs. For example, overfishing

[12] https://www.sciencedirect.com/science/article/abs/pii/S0308597X18301866?via%3Dihub.

sharks in Southern California has been linked to increased cephalopod (squid/octopus) populations, which then overconsume shellfish and crustaceans.[13,14]

- **Nutrient Cycling:** Migratory species transport nutrients across vast distances. When they feed in deep waters and excrete near the surface, they fertilize phytoplankton (the base of the marine food web), delivering valuable nutrients to MPAs. In addition, highly migratory species such as tunas and billfish contribute to the "biological carbon pump" by moving nutrients vertically, as part of benthic pelagic linkages, which enhances ocean productivity.
- **Protecting Spawning & Nursery Grounds:** Many HMS rely on offshore areas such as the MPAs for spawning and recruitment areas. The loss of protection not only may reduce recruitment success of the targeted HMS, but also loss of food sources for non-targeted species such as sea birds and rockfish. Consequently, the habitat health of these areas for non-HMS will be degraded.
- **Reducing Bycatch & Ecosystem Damage:** HMS fisheries (e.g., longlines, drift gillnets) often catch non-target species, including threatened and endangered species (leatherback turtles, short-tailed albatross). Furthermore, bycatch often includes species that are key ecosystem engineers (e.g., giant sea bass, which maintain kelp forest health).

Protecting HMS isn't just about saving iconic species—it's about **preserving the ocean's "circulatory system."** Their migrations connect distant ecosystems, making them indispensable to California's marine biodiversity.

B. MRWG Goals - **Socio-Economic & Sustainable Fisheries**

Under the socio-economic and sustainable fisheries goals established by the MRWG, the petitioners request to reclassify select MPAs to alleviate negative impacts on the fisheries for listed highly migratory species[15] would undo the achievements the MPAs have reached. The long-term benefits of maintaining the current level of protection have proven to outweigh the short-term socioeconomic losses that came with establishing the MPAs. For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species

[13] https://www.sciencedirect.com/science/article/abs/pii/S0165783698001787
[14] https://oceanrep.geomar.de/id/eprint/53785/1/4444.pdf
[15] List of State HMS, CPS, and Pelagic finfish per Title 14 CA § 1.49, 1.39, and 632(3): -Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). -Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens). -Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

within the CINMS blocks[16] used in Figure 2. [17] Pre-MPAs (1998-2002), the total value landed for the MPA fishing blocks within the CINMS was 2.899% and the total pounds landed was 4.030%. Post-MPAs (2020-2024), the total value landed for the MPA fishing blocks within the CINMS was 28.980% and the total pounds landed was 45.962%. By pounds and by value, there has been an increase in economic success that followed the establishment of the CINMS MPAs, indicating that opening the MPAs will not necessarily increase the benefit to the HMS fisheries. The return of many species, not just tuna and sharks, cannot be proven to have benefited solely from the establishment of the MPAs. However, the increase in population was and is likely amplified and supported by the MPA network.

[16] See Figure 1 for reference to the fishing blocks used in the analysis.
[17] Displays percentage values calculated by dividing the MPA petition fishing blocks by the CINMS fishing blocks. This was done to assess the economic impacts locally versus comparing the MPA petition fishing blocks to the entire state.

Block ID	Total Pounds	Total Value
707	$869	$4,537
708	$4,480	$15,767
709	$3,624	$16,934
710	$4,813	$6,555
764	$543	$2,632
765	$2,598	$14,079
683	$16,619	$23,693
684	$1,814	$3,364
685	$2,809	$6,680
686	$1,312	$3,564
687	$1,476	$3,454
688	$7,233	$9,766
689	$2,175	$4,742
690	$2,224	$3,346
691	$518	$943
706		Confidential
711	$2,889	$6,868
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Petition/All	0.191%	0.435%
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Petition/CINMS***	28.980%	45.962%

Table 2.[18] Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 2020- Dec 31, 2024.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

[18] Note “confidential” is data withheld by CDFW.

Block ID	Total Pounds	Total Value
707	$1008	$1279.25
708	$2395.9	$2626.375
709		Confidential
710	$4116.6	$3863.85
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Total Petition 2023-15*	$7520.5	$7769.475
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Total All Blocks	**32,150,483**	**$22,954,516**
Petition/All	0.0234%	0.0338%
CINMS/All	0.807%	0.840%
Petition/CINMS***	2.899%	4.030%

Table 3. Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 1998- Dec 31, 2002.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

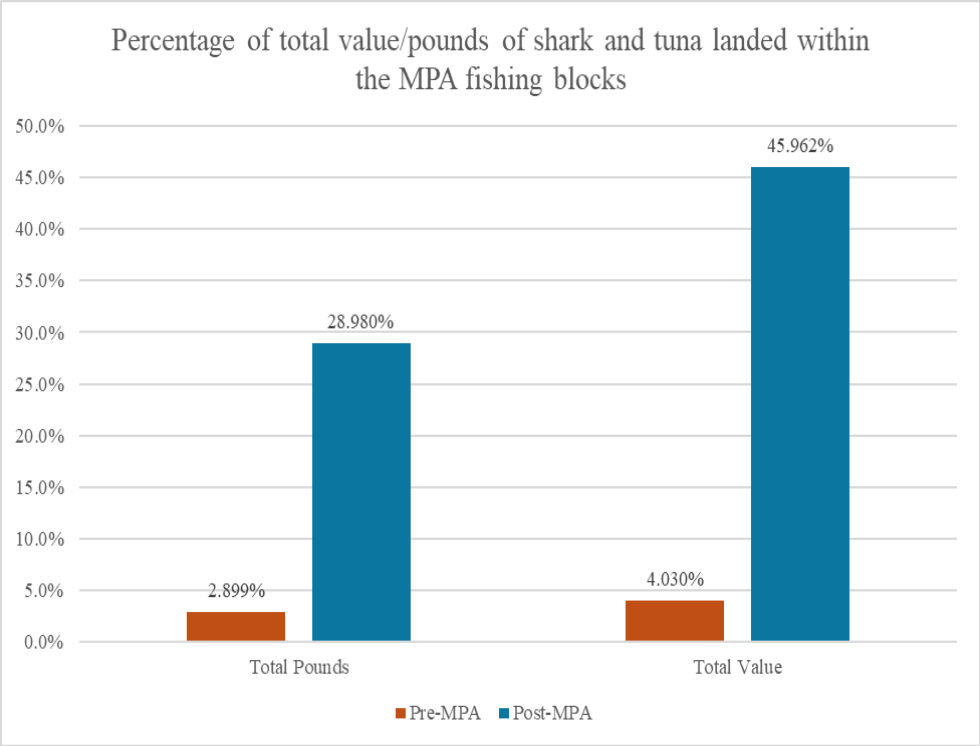

Figure 2. Comparison of Pre-MPA (Jan 1st, 1998- Dec 31st, 2002) and Post-MPA (Jan 1st, 2020- Dec 31st, 2024) total value and total weight by pounds of shark and tuna species landed within the MPA blocks compared to the CINMS fishing blocks.

C. MRWG Goals - **Natural and Cultural Heritage & Education**

An integral component of the CINMS MPAs and the statewide MPA Network is the inclusion of humans. The areas are not only to help conservation and enhance fisheries management, but to provide areas for spiritual, educational, and recreational opportunities.[19] A 2024 survey[20] revealed that 81% of Californians favor expanding MPAs to protect fish, wildlife, and their habitat off the state's coast. Protecting California waters is not only important for the species living in those environments, but also for California ocean users which include non-consumptive uses like beach going, whale watching, photography, surfing, scuba diving, and boating. The Natural and Cultural Heritage Goal and Education goals are intended to maintain areas in the marine environment that give an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically. The petitioners request to open three highly protected MPAs does not support these goals.

[19] 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).
[20] https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2024/

III. CONCLUSION

As California's ocean faces a growing suite of threats from climate change and other human uses, we urge the Commission and CDFW to use its authority to strengthen the MPA network to ensure adequate representation of all key habitats in MPAs so that California's MPA network remains an effective ecosystem-based approach for resilience into the future. To help ensure the network's health rejecting both petition 2023-14 MPA and petition 2023-15 MPA is necessary. Once again, we would like to thank both FGC and CDFW for their dedication to the adaptive management process of California's MPA network.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Rikki Eriksen
Marine Ecologist
California Marine Sanctuary Foundation

Tomas Valadez
California Policy Manager
Azul

Ray Hiemstra
Associate Director of Policy and Projects
Orange County Coastkeeper

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Executive Director
Environmental Action Committee of West Marin (EAC)

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US Ocean Conservation Manager
WILDCOAST

Zoe Collins
Marine Protected Area Program Coordinator
Heal the Bay

Penny Owens
Education & Community Outreach Director
Santa Barbara ChannelKeeper

FGC@FGC

From:	Azsha Hudson <ahudson@environmentaldefensecenter.org>
Sent:	Friday, October 3, 2025 11:54 AM
To:	FGC
Cc:	Samantha Murray; fgcericsklar@gmail.com; commissioner.zavaleta@gmail.com; commissionerdariusanderson@gmail.com; jhostler@trinidadrancheria.com; Maggie Hall
Subject:	Submission for FGC Supplemental Deadline
Attachments:	2025_10_02_Clarification re Petitioner 2023-15MPA_FINAL.pdf; 2025_07_25_MRC Opposed re MPA Petitions_FINAL.pdf

Hello,

Please see the attached letters for the upcoming Oct 8-9 FGC meeting.

Please note that one of the letters dated July 25th, was previously sent in July for the July MRC meeting. The second Dated for October is a clarification to a recently submitted rebuttal letter from the Petitioner for 2023-15MPA.

Thank you.

AZSHA HUDSON (she/her/hers)
MARINE CONSERVATION ANALYST & PROGRAM MANAGER
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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.

July 31, 2025

Erika Zavaleta
California Natural Resources Headquarters Building
715 P Street
2nd Floor
Sacramento, CA 95814

Re: <u>Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA</u>

Dear President Zavaleta and Honorable Commissioners:

We would like to begin by thanking the Marine Resource Committee, the full Fish and Game Commission (FGC) and California Department of Fish and Wildlife (CDFW) for their dedication to the adaptive management process of California's MPA network. As the FGC and CDFW continue reviewing the Marine Protected Area (MPA) petitions, we ask that you consider the below arguments against specific petitions looking to weaken the MPA network. Specifically, the requests of petition 2023-14 MPA to open nine MPAs along the coast to commercial urchin fishing and petition 2023-15 MPA to allow some form of take of highly migratory species, coastal pelagic species, and/or pelagic finfish at three MPAs at the Channel Islands.

I. <u>The FGC and CDFW Should Reject PETITION 2023-14MPA- Opening Sea Urchin Harvest to Commercial Fishermen Within Existing Marine Protected Areas.</u>

The decline of kelp forest ecosystem is due to many factors, including a significant increase in purple urchins, which leads to urchin barrens where vibrant kelp forests once existed. Petition 2023-14 MPA requests that nine existing MPAs from the North to the South Coast be opened for commercial urchin fishing for economic reasons. We request that the FGC and CDFW reject this petition to open multiple State Marine Conservation Areas (SMCAs) (Double Cone Rock SMCA, Sea Lion Cove SMCA, Stewart's Point SMCA, Salt Point SMCA, Naples SMCA, Anacapa Island SMCA, Point Dume SMCA, Point Vicente SMCA (no-take), Swami's SMCA) to allow commercial take of sea urchins to aid in kelp forest restoration. First, any benefits of this petition are outweighed by the considerable costs to the MPA goals and environment of allowing commercial urchin fishing in MPAs. Second, the lack of clarity by the petitioner as to which species of urchin would be commercially fished is concerning. Third,

using SeaSketch to determine habitat connectivity under the petitioners' request would see the loss in connectivity in multiple habitats.

A. Benefits and Cost Synthesis

The benefits and costs of harvesting sea urchins within MPAs in California are complex, involving ecological, economic, and management trade-offs. Here is a synthesis of key points.

1) **Scientific Disagreement and Uncertainty**: The trophic dynamics of predator-prey relationships for urchins within California are poorly understood and vary region to region. In Northern California, where purple urchin overpopulation has devastated kelp forests (creating "urchin barrens"), targeted harvesting has been used to aid kelp recovery. Projects like the Giant Kelp Restoration Project involved culling urchins, which allowed kelp to regrow in some areas. However, this project was highly restricted and regulated to minimize damage to the ecosystem while targeting the purple urchin using trained divers. The challenges and importance of regulating harvest within MPAs have been researched in the Mediterranean, with similar findings for the need to restrict and oversee any management interventions such as this.[1]
2) **Ecological Disruption**: MPAs are designed to protect trophic cascades, where predators (e.g., lobsters, sheephead, sea otters) control urchin populations, indirectly safeguarding kelp forests. Harvesting urchins—or their predators—can disrupt this balance, leading to kelp loss and habitat degradation. Currently, within California there is scientific uncertainty about the conditions under which urchin harvest will benefit or harm the marine ecosystem.[2]
3) **Undermines MPA Goals:** Studies in Sardinia found that allowing urchin harvest in MPAs led to population declines, especially where natural predation was already high. Restricted harvest sites, which were highly managed and restricted, had the lowest urchin densities, suggesting cumulative pressures harm recovery.[3] Prohibiting any type of harvest – including sea urchins- has been effective in California.[4]
4) **Short term economic gains over long term ecosystem protection:** The rationale for the petition is rooted in the desire of commercial fishermen- primarily in Southern California- who want to harvest sea urchins arguing that MPAs cause economic hardship. MPAs were established to prioritize biodiversity over short-term fisheries gains, as kelp forests support hundreds of species and mitigate climate impacts.[5] The long-term benefits from protection far exceed short term loss for a handful of fishermen, MPAs are not just conservation tools—they are **investments in sustainable fisheries.**

[1] https://peerj.com/articles/12971/
[2] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/; https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2022.987242/full
[3] https://pmc.ncbi.nlm.nih.gov/articles/PMC8908888/
[4] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/
[5] https://caseagrant.ucsd.edu/news/examining-climate-wins-marine-protected-areas

B. The Petition is Not Supported and Does Not Specify Which Species of Urchin is Included

As the petition reads, the take allowance is for ALL allowed sea urchin species and does not make the distinction of which species would be targeted to benefit kelp forests. According to CDFW, three sea urchin species have been the main species landed across the state. The red, purple, and white sea urchin are the primary species historically caught in California waters, with red urchins being the dominant species caught and sold (Table 1). From January 31, 1980, to December 31, 2024, the total purple urchin landings out of all sea urchin landings (Table 1) accounted for less than one percent of the total catch. The petitioner does not indicate if the allowance for commercial take of sea urchins would be for a specific species or all.

Species Name	Pounds	Value
Sea urchin, red	774,479,211	$429,008,941
Sea urchin, purple	2,043,647	$2,928,395
Sea urchin, white	53,647	$207,324
Total	776,576,511	$432,144,719

Table 1. Sea Urchins landed from January 31, 1980, to December 31, 2024.

It is our understanding that much of the commercial urchin fishery is focused on red urchins (Table 1), but it is the abundance of purple urchins that has contributed to the kelp decline[6] cited in the petition. Paired with the lack of a commercial market for purple urchin, sea urchins collected from barren areas are unlikely to meet the quality standards to be commercially viable. The petitioner's argument for opening the forementioned MPAs to be sustainable additions to the commercial fishery is not supported. Additionally, the petitioners did not provide any supporting data for the claim that these nine MPAs have had a significant negative impact on the urchin fishery, nor data on urchin abundance within these MPAs that could be used to do a cost-benefit analysis.

Urchin culling is one method that has had small trials along the California coast to determine effectiveness of direct removal on improving kelp forest density. It was named as a potential tool in the 2022 report "Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach."[7] However, the report also found that scaling up this process would face challenges. Specifically, the costs to go to the sites and remove the urchins would be, "most effective in areas where there is already an established commercial red urchin fishing fleet"[8] Additionally, the report indicates that reducing and **maintaining** low urchin levels is imperative to maintain kelp ecosystem recovery. The long-term socio-economic effectiveness of urchin

[6] Smith, J. G., et al. (2021). Behavioral responses across a mosaic of ecosystem states restructure a sea otter–urchin trophic cascade. *Proceedings of the National Academy of Sciences*, *118*(11), e2012493118.
[7] https://www.reefcheck.org/wp-content/uploads/2022/06/Restoration-of-Northern-Californa-bull-kelp-RCF-final-report-to-OPC.pdf
[8] Ward, M., et al. Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach. Reef Check Foundation, Marina del Rey, CA, April 2022.

culling is low, as the costs to start and continue removal efforts increase the further the site is from shore and/or a red urchin port, as well as the lack of viable commercial purple urchin that live inside urchin barrens. It is difficult to say whether opening identified MPAs in this petition would benefit the commercial purple or red urchin fishery.

C. Habitat Connectivity

We utilized the data layers on the recently released tool via SeaSketch to see which habitats will lose connectivity based on the petitioners desired changes to the MPA Network. Of the listed MPAs, Point Dune SMCA, Swamis SMCA, and Point Vicente SMCA would no longer have adequate protections to maintain habitat connectivity for beach, rock, kelp, and soft substrate (0-30m) habitat. The other six MPAs do not have a high enough level of protection to count towards the habitat spacing report.

Accordingly, the petition should be rejected.

II. The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.

This petition requests opening existing no take reserves—the cornerstone of the MPA Network—to commercial fishing for pelagic species, which encompasses a wide range of species,[9] such as sharks, bill fish, tuna, and mahi mahi in Southern California. The Channel Islands State Marine Reserves (SMRs), and Federal Marine Reserves (FMRs) are among the biggest, oldest and most effective MPAs in the country. Petition 2023-15MPA does not support the goals identified during the planning process for the Channel Islands MPAs, and we therefore request that the FGC and CDFW reject the petition to reclassify three SMRs (Footprint SMR, Gull Island SMR, Santa Barbara Island SMR) in the Northern Channel Islands (NCIs) as SMCAs.

Established in 2003 after the Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC), the Marine Reserves Working Group (MRWG) came up with goals for MPAs at the Channel Islands. The MRWG's goals stated the following:

> (1) Ecosystem Biodiversity Goal: To protect representative and unique marine habitats, ecological processes, and populations of interest; (2) Socio-Economic Goal: To maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties; (3) Sustainable Fisheries Goal: To achieve sustainable fisheries by integrating marine reserves into fisheries management; (4) Natural and Cultural Heritage Goal: To maintain areas for visitor, spiritual, and recreational opportunities which include cultural and ecological features and their associated values; and (5) Education Goal: To foster stewardship of the marine environment by providing

[9] https://www.ecfr.gov/current/title-50/chapter-VI/part-660/subpart-K

> educational opportunities to increase awareness and encourage responsible use of resources.[10]

We utilized the goals and reasonings from the "Final 2002 Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary" as the Channel Islands state and federal MPAs pre-date the Marine Life Protection Act and subsequent establishment of the statewide MPA network. Approval of this petition would be inconsistent with these goals for the following reasons.

A. MRWG Goal - **Ecosystem Biodiversity**

The establishment of the Channel Islands MPAs was, "To protect representative and unique marine habitats, ecological processes, and populations of interest," which has translated to the goals and intent of the statewide MPA Network. Past petitions requesting to establish MPAs to protect a singular species have been denied by the FGC. For example, in 2020-2021 the FGC denied a petition requesting for the creation of an MPA for White Sharks near Carpentaria reasoning, "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species."[11] The intent of California MPAs remains to protect all aspects of an ecosystem (ecosystem-wide protection), not one species. Consequently, opening an MPA for one species should also be rejected.

The petitioner makes the argument that opening Footprint SMR, Gull Island SMR, Santa Barbara Island SMR to fishing pressure would have no significant impact on non-migratory species within the MPAs. However, the increase in boat traffic through the previously closed areas would introduce noise pollution, potential derelict fishing gear, water pollution, etc. The added complexities in the individual MPAs regulations will also increase the hardship on enforcement. Additionally, the same reasons cited to open these MPAs to highly migratory species are also the reasons why we believe it is unnecessary to do so.

[10] 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).
[11] California Department of Fish and Wildlife (2022). Decadal Management Review: Appendix G Supplemental Tables.

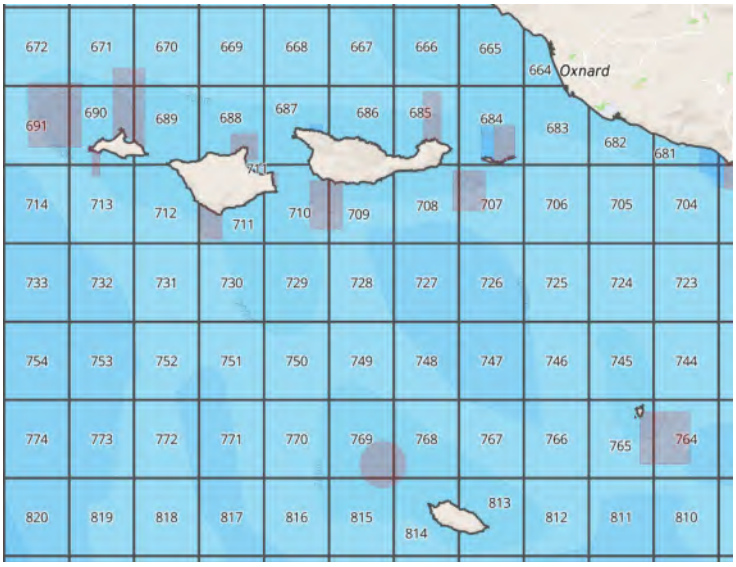

Figure 1. Seasketch Map using layers "Commercial Fishing Blocks" and "Existing Marine Protected Areas (MPAs)"

1. Reasons Why MPAs Protect Highly Migratory Species

Protecting highly migratory species (HMS) like tunas, sharks, and billfish in California waters plays a critical role in maintaining healthy marine ecosystems through trophic cascades, nutrient cycling, and habitat connectivity.

Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition.[12] A sharp decline of large pelagic fish (species such as sharks, swordfishes, marlins, and tuna) that roam the open sea and play vital roles as predators leads to impacts on local, regional and large-scale ecosystem dynamics. Fishing undermines MPA effectiveness which leads to target species depletion, leading to their inability to recover even within MPAs. The risk of bycatch on unintended species is high and unaccounted for, leading to ineffectiveness of the local MPA for all other components of the ecosystem.

2. Maintaining Trophic Balance (Top-Down Control)

- **Predator-prey dynamics:** HMS like bluefin tuna, mako sharks, and swordfish are apex predators that regulate mid-level species (e.g., squid, small fish). Their decline can trigger population explosions of prey species, disrupting food webs. For example, overfishing sharks in Southern California has been linked to increased cephalopod (squid/octopus) populations, which then overconsume shellfish and crustaceans.[13,14]

[12] https://www.sciencedirect.com/science/article/abs/pii/S0308597X18301866?via%3Dihub.
[13] https://www.sciencedirect.com/science/article/abs/pii/S0165783698001787
[14] https://oceanrep.geomar.de/id/eprint/53785/1/4444.pdf

- **Nutrient Cycling:** Migratory species transport nutrients across vast distances. When they feed in deep waters and excrete near the surface, they fertilize phytoplankton (the base of the marine food web), delivering valuable nutrients to MPAs. In addition, highly migratory species such as tunas and billfish contribute to the "biological carbon pump" by moving nutrients vertically, as part of benthic pelagic linkages, which enhances ocean productivity.
- **Protecting Spawning & Nursery Grounds:** Many HMS rely on offshore areas such as the MPAs for spawning and recruitment areas. The loss of protection not only may reduce recruitment success of the targeted HMS, but also loss of food sources for non-targeted species such as sea birds and rockfish. Consequently, the habitat health of these areas for non-HMS will be degraded.
- **Reducing Bycatch & Ecosystem Damage:** HMS fisheries (e.g., longlines, drift gillnets) often catch non-target species, including threatened and endangered species (leatherback turtles, short-tailed albatross). Furthermore, bycatch often includes species that are key ecosystem engineers (e.g., giant sea bass, which maintain kelp forest health).

Protecting HMS isn't just about saving iconic species—it's about **preserving the ocean's "circulatory system."** Their migrations connect distant ecosystems, making them indispensable to California's marine biodiversity.

B. MRWG Goals - **Socio-Economic & Sustainable Fisheries**

Under the socio-economic and sustainable fisheries goals established by the MRWG, the petitioners request to reclassify select MPAs to alleviate negative impacts on the fisheries for listed highly migratory species[15] would undo the achievements the MPAs have reached. The long-term benefits of maintaining the current level of protection have proven to outweigh the short-term socioeconomic losses that came with establishing the MPAs. For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species within the CINMS blocks[16] used in Figure 2. [17] Pre-MPAs (1998-2002), the total value landed

[15] List of State HMS, CPS, and Pelagic finfish per Title 14 CA § 1.49, 1.39, and 632(3): -Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). -Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens). -Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

[16] See Figure 1 for reference to the fishing blocks used in the analysis.

for the MPA fishing blocks within the CINMS was 2.899% and the total pounds landed was 4.030%. Post-MPAs (2020-2024), the total value landed for the MPA fishing blocks within the CINMS was 28.980% and the total pounds landed was 45.962%. By pounds and by value, there has been an increase in economic success that followed the establishment of the CINMS MPAs, indicating that opening the MPAs will not necessarily increase the benefit to the HMS fisheries. The return of many species, not just tuna and sharks, cannot be proven to have benefited solely from the establishment of the MPAs. However, the increase in population was and is likely amplified and supported by the MPA network.

[17] Displays percentage values calculated by dividing the MPA petition fishing blocks by the CINMS fishing blocks. This was done to assess the economic impacts locally versus comparing the MPA petition fishing blocks to the entire state.

Block ID	Total Pounds	Total Value
707	$869	$4,537
708	$4,480	$15,767
709	$3,624	$16,934
710	$4,813	$6,555
764	$543	$2,632
765	$2,598	$14,079
683	$16,619	$23,693
684	$1,814	$3,364
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** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
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CINMS/All	0.807%	0.840%
Petition/CINMS***	2.899%	4.030%

Table 3. Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 1998- Dec 31, 2002.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

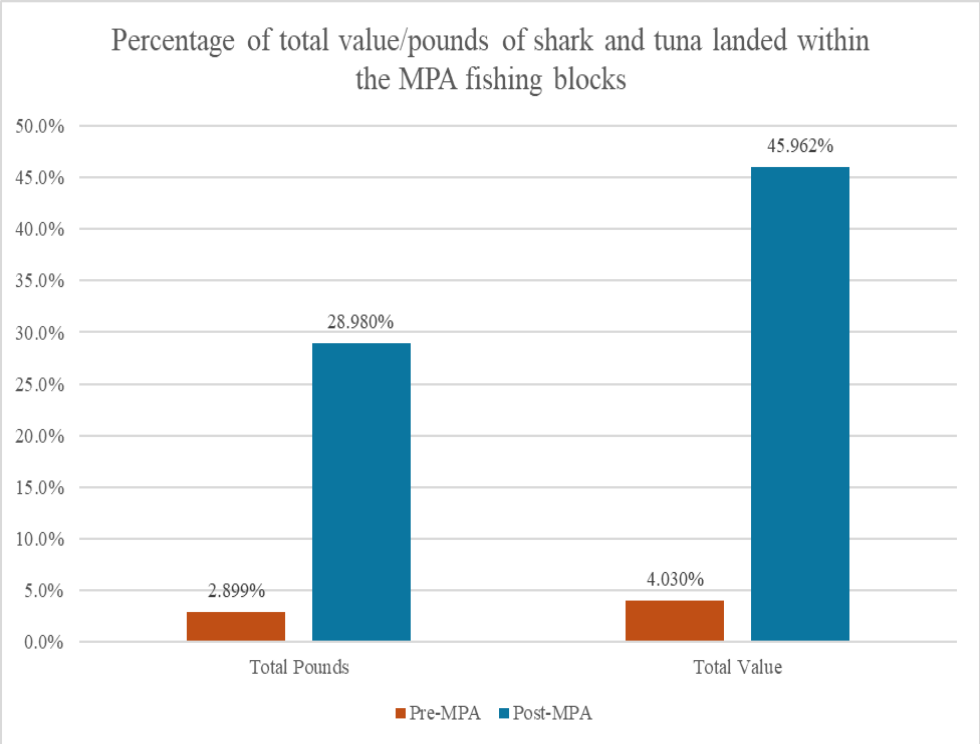


Figure 2. Comparison of Pre-MPA (Jan 1st, 1998- Dec 31st, 2002) and Post-MPA (Jan 1st, 2020- Dec 31st, 2024) total value and total weight by pounds of shark and tuna species landed within the MPA blocks compared to the CINMS fishing blocks.

C. MRWG Goals - **Natural and Cultural Heritage & Education**

An integral component of the CINMS MPAs and the statewide MPA Network is the inclusion of humans. The areas are not only to help conservation and enhance fisheries management, but to provide areas for spiritual, educational, and recreational opportunities.[19] A 2024 survey[20] revealed that 81% of Californians favor expanding MPAs to protect fish, wildlife, and their habitat off the state's coast. Protecting California waters is not only important for the species living in those environments, but also for California ocean users which include non-consumptive uses like beach going, whale watching, photography, surfing, scuba diving, and boating. The Natural and Cultural Heritage Goal and Education goals are intended to maintain areas in the marine environment that give an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically. The petitioners request to open three highly protected MPAs does not support these goals.

III. CONCLUSION

[19] 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).
[20] https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2024/

As California's ocean faces a growing suite of threats from climate change and other human uses, we urge the Commission and CDFW to use its authority to strengthen the MPA network to ensure adequate representation of all key habitats in MPAs so that California's MPA network remains an effective ecosystem-based approach for resilience into the future. To help ensure the network's health rejecting both petition 2023-14 MPA and petition 2023-15 MPA is necessary. Once again, we would like to thank both FGC and CDFW for their dedication to the adaptive management process of California's MPA network.

Sincerely,

October 3, 2025

Erika Zavaleta, President
California Fish and Game Commission
California Natural Resources Headquarters Building
715 P Street, 2nd Floor
Sacramento, CA 95814

Re: **Clarification to Letter 'Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023- 15MPA' and rebuttal from Petitioner re Petition 2023- 15MPA**

Dear President Zavaleta and Honorable Commissioners:

The following information is submitted to clarify the framing and content of the letter of support submitted by the Environmental Defense Center (EDC) on July 31, 2025, titled 'Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023- 15MPA' (July letter). This letter is submitted because the petitioner of petition 2023-15MPA submitted a letter to the Fish and Game Commission in late September 2025, concerning EDC's data collection and other issues. Specifically, the clarifications included in this letter concern Section 2 of the July letter,

titled 'The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.'

As explained below, EDC appropriately collected data from the agency's Marine Fisheries Data Explorer in conducting our evaluation of petition 2023-15MPA. In addition, EDC did not single out gear types in our analysis of whether MPAs benefit fisheries.

I. The FGC Marine Fisheries Data Explorer Breakdown

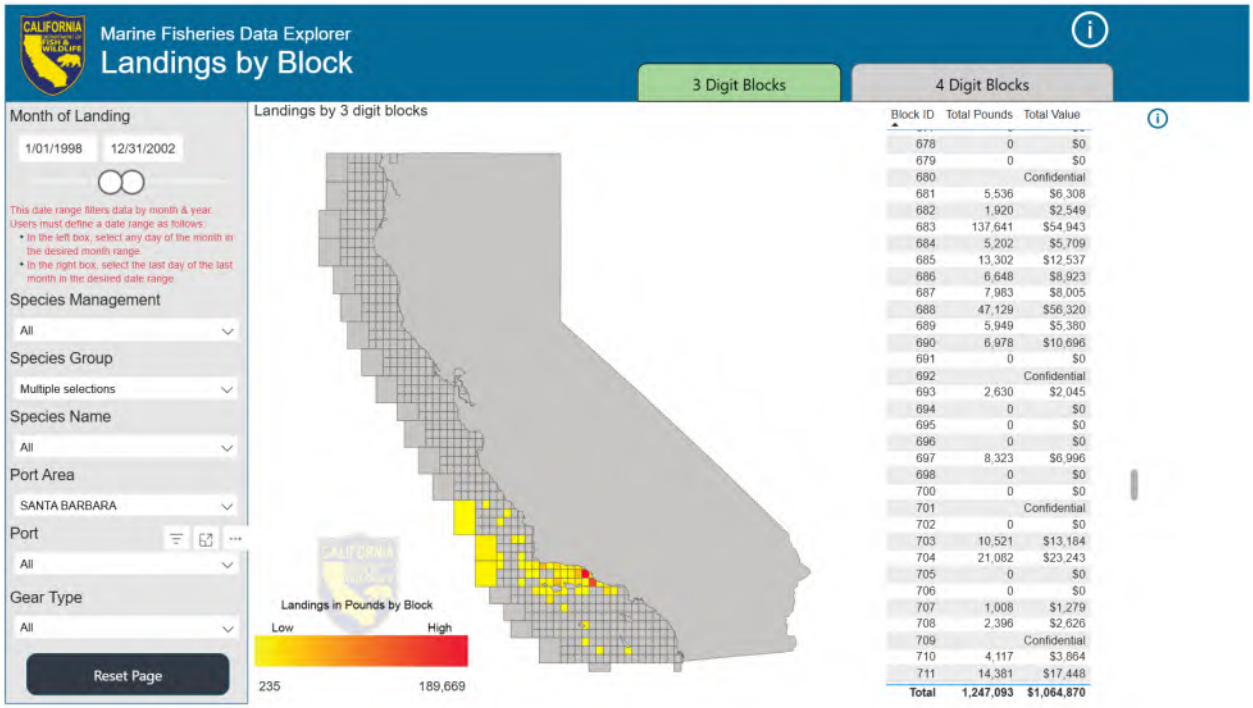
A. Framing of EDC's Analysis

The goal of the analysis conducted for the July letter was to determine if the establishment of Marine Protected Areas (MPAs) in California had tangible improvements to fish landings. We set the time frames for pre and post MPA establishment to reflect this intent, utilizing the shark and tuna species filter as an example, as stated on page 7 under section B, "For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species within the CINMS blocks...". The analysis was not specifically targeted at pelagic vs non-pelagic species, rather we investigated whether there is a benefit to MPAs that has impacted the amount of catch in the area.

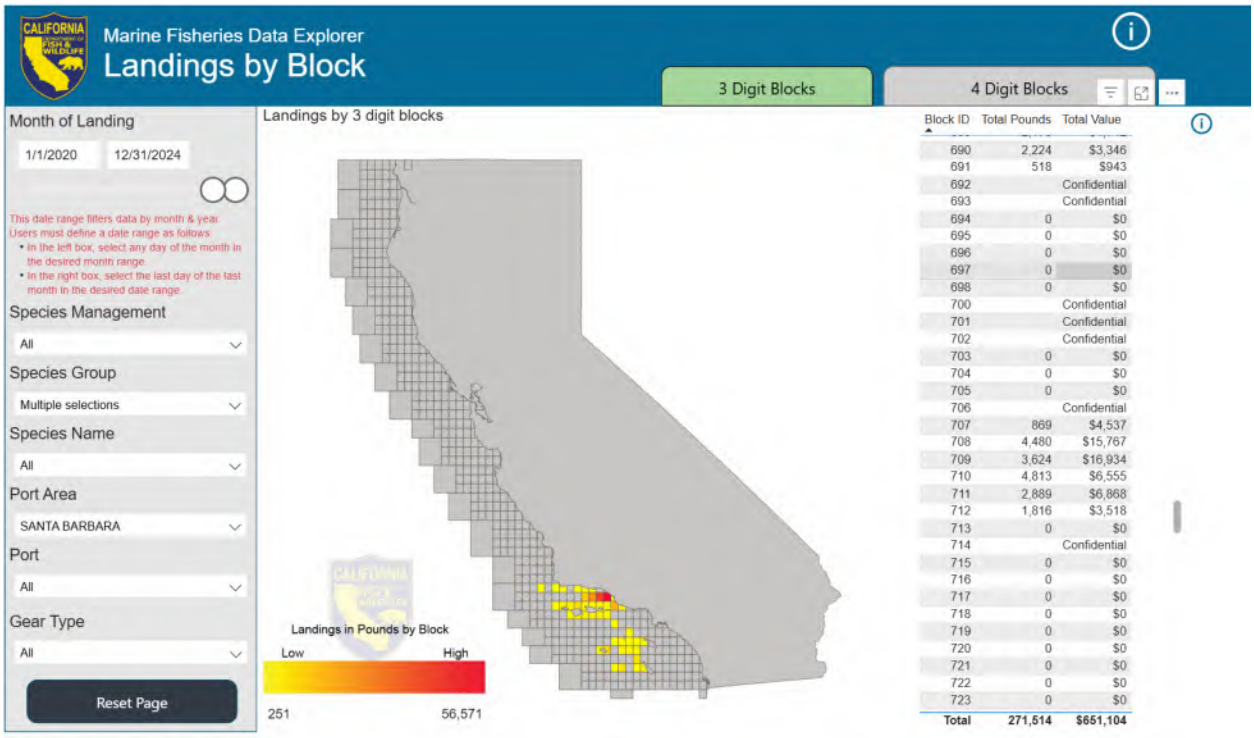
B. EDC Process for Data Collection

The following steps describe EDC's approach to data collection underlying the letter.

1. Access the Marine Fisheries Data Explorer: https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE
2. Under "Visualize"(the first box on the left), select "Landings by Block" (second link)
3. Change the parameters to fit the target time frame, location, and species
    a. Species management – N/A
    b. Species Group – Shark and tuna
    c. Species Name – N/A
    d. Port Area – Santa Barbara
    e. Port – N/A
    f. Gear Type – N/A
4. Data explored will produce a table on the right hand side (refer to below screenshots captured on October 1, 2025)



Screenshot of data from CA Department of Fish and Wildlife: Marine Fisheries Data Explorer. For the timeframe of Jan 1, 1998- Dec 31, 2002, species selected are sharks and tuna.



Screenshot of data from CA Department of Fish and Wildlife: Marine Fisheries Data Explorer. For the timeframe of Jan 1, 2020- Dec 31, 2024, species selected are sharks and tuna.

C. Comparison of Data Collected for the July Letter

The following tables were populated by data directly downloaded from the Marine Fisheries Data Explorer for the July letter and this letter (pulled on October 1, 2025). The petitioner states that the data is "allegedly confidential," leading to results that are swayed to fit our specific narrative. The petitioner does not supply any data from the Marine Fisheries Data Explorer to showcase the discrepancy in data. Additionally, it is listed on the Marine Fisheries Data Explorer User Guide: Confidential Data[1] that:

> Pursuant to California Fish and Game Code Section 8022, commercial landings data is considered confidential. Landings data in the MFDE, is therefore summarized and presented so as not to disclose data from an individual or business. Landings data marked as "Confidential" in the MFDE indicates there was insufficient data to summarize and maintain confidentiality.

On October 1, 2025, we again pulled the below data from the Marine Fisheries Data Explorer to determine if there were any changes to the data after submission of the July letter. As apparent in the tables below, there has been no change to the data from July to October, and therefore no change to the analysis EDC conducted.

[1] https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE/User-Guide

Please see the table comparing values for 1998-2002 below.[2]

	July letter submission data		**October 1, 2025 data collection**	
Block ID	**Total Pounds**	**Total Value**	**Total Pounds**	**Total Value**
707	1008	$1,279.25	1,008	$1,279
708	2395.9	$2,626.38	2,396	$2,626
709		Confidential		Confidential
710	4116.6	$3,863.85	4,117	$3,864
764		Confidential		Confidential
765		Confidential		Confidential
683	137641	$54,943	137,641	$54,943
684	5202	$5,709	5,202	$5,709
685	13302	$12,537	13,302	$12,537
686	6648	$8,923	6,648	$8,923
687	7983	$8,005	7,983	$8,005
688	47129	$56,320	47,129	$56,320
689	5949	$5,380	5,949	$5,380
690	6978	$10,696	6,978	$10,696
691	0	$0	0	$0
711	14381	$17,448	14,381	$17,448
712	2009	$1,149	2,009	$1,149
713	4705	$3,895	4,705	$3,895
744	0	$0	0	$0
745		Confidential		Confidential
*Total Petition 2023-15**	7520.5	$7,769.48		
*Total CINMS***	259446.93	$192,775.29		
Total All Blocks	**32,150,483**	**$22,954,516**		
Petition/All	0.02%	0.03%		
CINMS/All	0.81%	0.84%		
*Petition/CINMS****	2.90%	4.03%		

[2] Please note that the values under "Total pounds" on the July letter were labeled as a currency which is incorrect, however that does not change the results.

Please see the table comparing values for 2020-2024 below.[3]

2020- 2024 Table

	July letter submission data		**October data collection**	
Block ID	**Total Pounds**	**Total Value**	**Total Pounds**	**Total Value**
707	869	$4,537	869	$4,537
708	4480	$15,767	4,480	$15,767
709	3624	$16,934	3,624	$16,934
710	4813	$6,555	4,813	$6,555
764	543	$2,632	543	$2,632
765	2598	$14,079	2,598	$14,079
683	16619	$23,693	16,619	$23,693
684	1814	$3,364	1,814	$3,364
685	2809	$6,680	2,809	$6,680
686	1312	$3,564	1,312	$3,564
687	1476	$3,454	1,476	$3,454
688	7233	$9,766	7,233	$9,766
689	2175	$4,742	2,175	$4,742
690	2224	$3,346	2,224	$3,346
691	518	$943	518	$943
706		Confidential		Confidential
711	2889	$6,868	2,889	$6,868
712	1816	$3,518	1,816	$3,518
713	0	$0	0	$0
744	598	$1,199	598	$1,199
745		Confidential		Confidential
*Total Petition 2023-15**	16927	$60,505		
*Total CINMS***	58409	$131,642		
Total All Blocks	8849117	**$13,908,685**		
Petition/All	0.19%	0.44%		
CINMS/All	0.66%	0.95%		
*Petition/CINMS****	28.98%	45.96%		

[3] Please note that the values under "Total pounds" on the July letter were labeled as a currency which is incorrect, however that does not change the results.

II. Gear Type Request of the Petitioner

The petitioner also claims that we misconstrued the gear type allowance listed in petition 2023-15MPA. In the July letter the only reference to longlines and drift gillnets was as an example of bycatch offenders found on page 7, section 2.A.2. Nowhere else in section 2 (addressing petition 2023-15MPA) did we list a gear type; instead, the arguments made in the letter center around our opposition to the weakening of these MPAs, which for twenty years have been allowed to heal without extractive practices.

III. Conclusion

Accordingly, we respectfully request that the Commission consider the points previously articulated in EDC's letters, which are appropriately supported by relevant data. Please do not hesitate to let us know if you have any questions or would like additional information.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Ashley Eagle-Gibbs, Esq.
Executive Director
Environmental Action Committee of West Marin

Ray Hiemstra
Associate Director of Policy and Projects
Orange County Coastkeeper

Katie O'Donnell
US Ocean Conservation Manager
WILDCOAST

Tomas Valadez
California Policy Manager
Azul

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
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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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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.

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

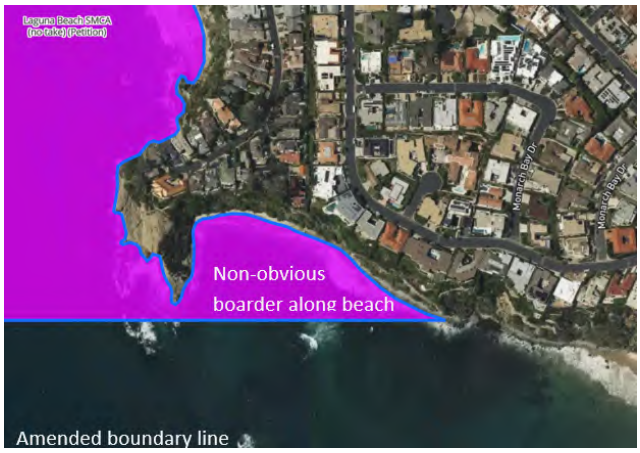
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced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

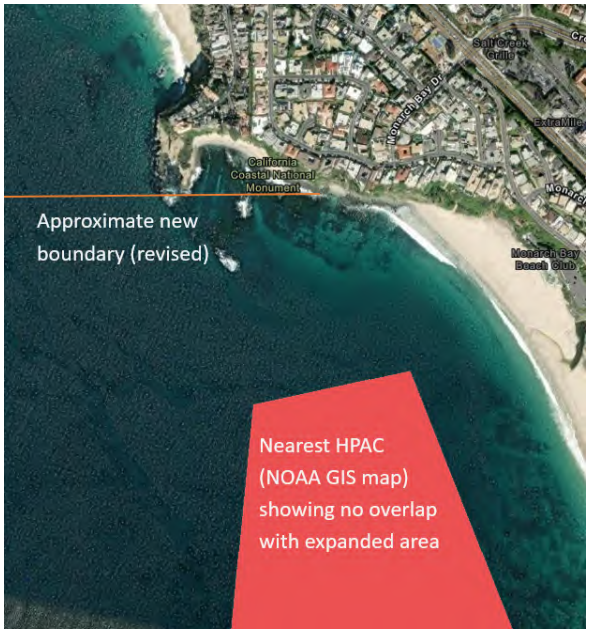
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational 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).

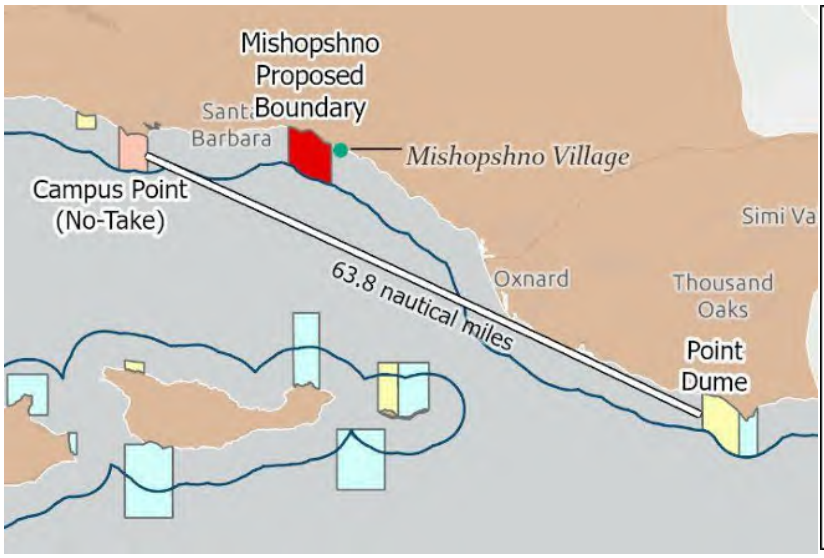


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

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).

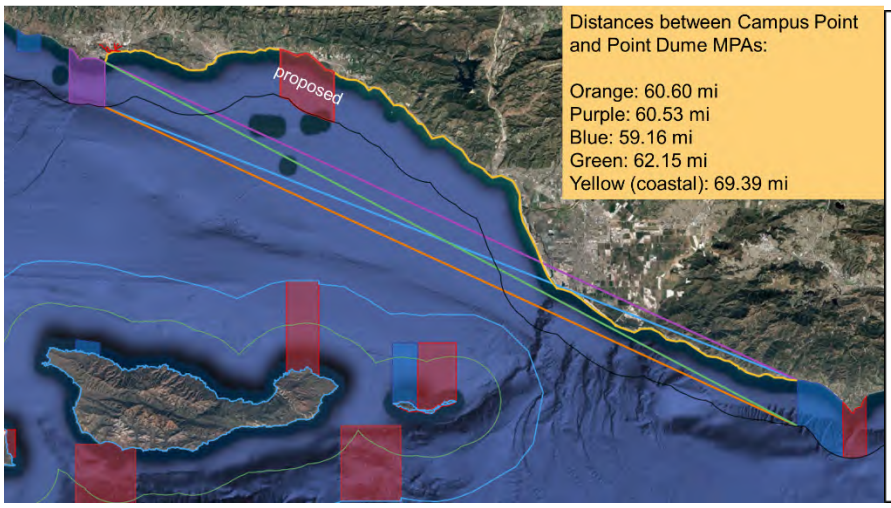


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

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.

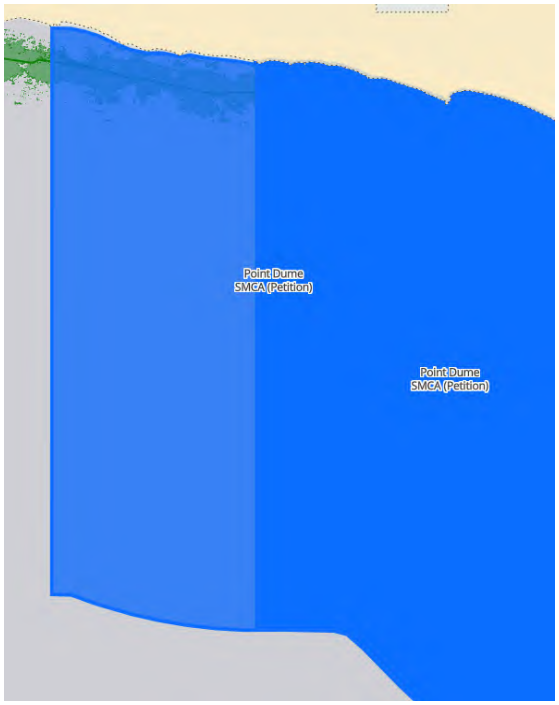
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing 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.

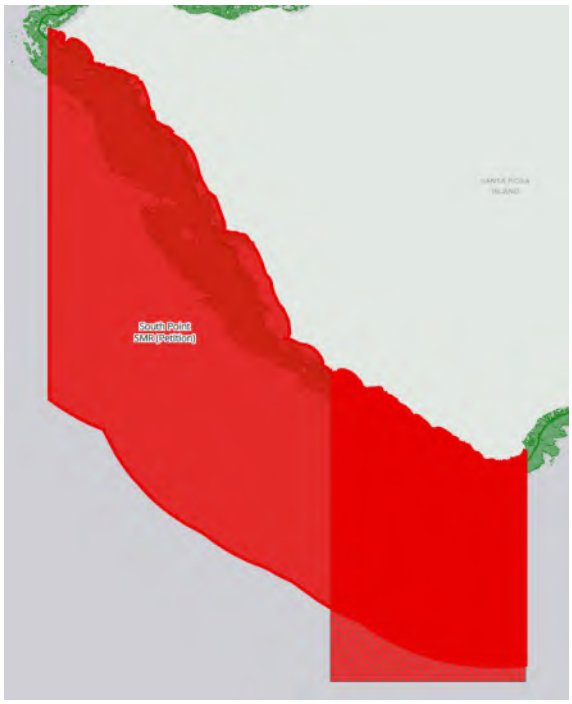
<u>Petition2023-33MPA – Reject</u>

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

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

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

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

Marine Conservation Institute
14301 Arnold Dr. Suite 25 • Glen Ellen, CA 95442 USA
www.marine-conservation.org

Outlook

April 2026 FGC Meeting Agenda Item 2: MPA Petitions Public Comment Letter

From Katie O'Donnell <katie@wildcoast.org>
Date Thu 04/02/2026 04:14 PM
To FGC <FGC@fgc.ca.gov>; fgcericsklar[redacted]; Samantha Murray [redacted] commissionerdariusanderson [redacted] commissioner.zavaleta [redacted]; jhostler [redacted]
Cc Shuman, Craig [redacted]; Waggoner, Claire [redacted]; Worden, Sara [redacted]; Eckerle, Jenn@CNRA <Jenn.Eckerle@resources.ca.gov>; Lewis, Staci@CNRA <Staci.Lewis@resources.ca.gov>; Esgro, Michael@CNRA <Michael.Esgro@resources.ca.gov>; Ashcraft, Susan [redacted] Miller-Henson, Melissa [redacted]

Good afternoon,

Please see the attached letter for **Agenda Item 2: MPA Petitions** for the upcoming April 15-16 FGC meeting.

Signed by 31 organizations and 2 individuals, the letter respectfully asks the FGC Commission to support CDFW's recommendation to reject petitions 2023-14, 2023-15, 2023-16, and 2023-18 (except for supporting 2023-18MPA_2: Marine Monitor radar at Point Conception).

This letter summarizes how these petitions would weaken the MPA network's integrity, fail to adhere to science-based guidelines and Marine Life Protection Act goals, and conflict with the Decadal Management Review. The letter notes that in total, the four petitions would reduce protections across 18 MPAs within California's MPA Network.

Thank you for your leadership and for considering these comments.

Please let me know if you have any questions!

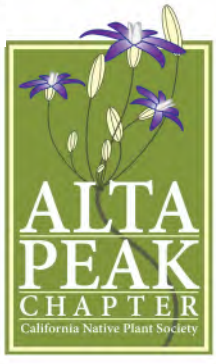
Thank you,
Katie

--

WILDCOAST COSTASALVAJE

Katie O'Donnell
Senior Ocean Conservation Manager
she/her/hers

DONATE TODAY!



Friends of Rose Creek
"Connecting Our Communities"

April 2, 2026

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

Submitted electronically to fgc@fgc.ca.gov

RE: **Agenda Item 2** - Opposition to Petitions 2023-14, 2023-15, 2023-16, and 2023-18 which would weaken the California MPA Network

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

The undersigned organizations -representing public interest, marine science, environmental conservation, and coastal communities - strongly oppose Petitions 2023-14, 2023-15, 2023-16, and 2023-18 and agree with California's Department of Fish and Wildlife (CDFW)'s recommendations to deny them. These proposals would significantly weaken California's Marine Protected Area (MPA) Network and undermine the ecological integrity that the Marine Life Protection Act (MLPA) was created to protect. In total, the petitions would reduce protections across eighteen MPAs, including six State Marine Reserves (SMRs), two no-take State Marine Conservation Areas (SMCAs), eight SMCAs, and two Special Closure Areas.

We urge the Fish and Game Commission (FGC) to deny petitions that fail to meet the Decadal Management Review (DMR)'s definition of adaptive management: "Guided by the principles of adaptive management, [the first ten-year management review] is an opportunity to evaluate progress to date, celebrate accomplishments, provide lessons learned, and identify recommendations to strengthen the MPA Network and Management Program going forward."[1]

We oppose these petitions because they:

- **Weaken MPA Network Integrity**
  California's MPA network was intentionally designed using science-based guidelines developed by CDFW and expert scientists to ensure larval connectivity, habitat representation, trophic structure, and ecosystem resilience. Because the network functions as an interconnected system, weakening individual MPAs compromises the entire network and conflicts with the goals of the MLPA. The International Union for Conservation of Nature (IUCN) recognized the network's effectiveness by adding it to the Green List of Protected and Conserved Areas after a seven-year evaluation. Rolling back protections or increasing extractive activities threatens the network's ability to sustain biodiversity and ecological connectivity.

[1]California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022, nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209.

- **Fail to Adhere to Science-Based Guidelines and MLPA Goals**
  The MLPA requires that any modifications to MPAs support its six statutory goals and align with established scientific guidelines[2]. The petitions fail to meet these standards. The network's design was grounded in peer-reviewed research on fish movement, larval dispersal, and population persistence, including spatial population models demonstrating that minimum size and spacing criteria are essential for ecological connectivity. Reducing protections in ways that violate these criteria lacks scientific justification and risks degrading network performance.

  Scientific literature is also clear that adaptive management is intended to strengthen MPAs based on monitoring data, not weaken them[3]. As California enters a critical phase of long-term monitoring and adaptive management, peer-reviewed guidance emphasizes that adaptability means refining protections using new evidence, not making ad hoc reductions. A 2023 global synthesis of 307 MPA design recommendations across 56 publications established "permanence and adaptability" as foundational principles, defining the latter specifically as evidence-based enhancement rather than diminished protection[4].

- **Do Not Align with the Decadal Management Review (DMR)**
  The state has invested heavily in monitoring and data synthesis, including more than $60 million from the Ocean Protection Council since 2017. Findings from the DMR highlight the need to maintain and enhance resilience in the face of climate change, which is a goal fundamentally incompatible with weakening existing protections.

Deny Petition 2023-14MPA: Opening Sea Urchin Harvest to Commercial Fishing Within Existing MPAs

The undersigned organizations urge the FGC to reject Petition 2023-14MPA. The proposed changes fail to address the underlying drivers of kelp decline, contradicts the core mandates of the MLPA, and would weaken the integrity of the broader MPA network. We support CDFW's recommendation to deny the petition, including its conclusion that the proposal conflicts with the original objectives of the affected MPAs and does not align with adaptive management guidance from the DMR.

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[2]California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[3] Van Diggelen, Amanda D., et al. "California's Lessons Learned and Recommendations for Effective Marine Protected Area Network Management." *Marine Policy*, vol. 137, Mar. 2022, p. 104928, https://doi.org/10.1016/j.marpol.2021.104928. 7 January 2022.

[4] Burns, E. S., et al. "Finding harmony in Marine Protected Area design guidelines." *Conservation Science and Practice*. Vol. 5, Issue 6. https://doi.org/10.1111/csp2.12946. 24 April 2023.

The Proposed Action Would Not Address Kelp Loss

The petition seeks to open nine SMCAs to commercial urchin harvest to support kelp restoration. However, purple urchins - the species responsible for kelp barrens - represent only 0.26% of commercial landings and have almost no market value. Red urchins make up 99.73% of landings but are not driving kelp decline[5]. Opening MPAs would therefore incentivize removal of red urchins, not the ecologically harmful purple urchins, and would not meaningfully reduce urchin pressure on kelp forests. Current research instead supports targeted, science-based purple urchin removals using trained divers to minimize ecosystem impacts[6], [7].

The Petition Conflicts With MLPA Goals

The proposal undermines four MLPA goals (1, 2, 5, and 6) by exposing protected species to increased risk, weakening trophic dynamics, and creating enforcement challenges[8]. Allowing commercial take within MPAs increases confusion and accidental take, contradicting the MLPA's requirement for clear, enforceable protections[9]. Multiple gear types can be used to take urchins[10], and vessels can carry or switch gear, making it difficult for wardens to verify compliance within SMCAs[11]. Increasing allowable take in MPAs with already complex rules runs counter to MLPA Goal 5 and to the DMR's emphasis on improving,not weakening, management effectiveness.

In Southern California MPAs, intact trophic cascades have been shown to support kelp resilience during marine heatwaves[12],[13]. In these systems, predators such as lobsters and sheephead naturally regulate urchin populations [14],[15]. Opening these MPAs to commercial urchin harvest would erode these predator-prey relationships.

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[5] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[6] Bennet and Caton,2019. Marine heat wave and multiple stressors tip bull kelp forest to sea urchin barrens.https://www.nature.com/articles/s41598-019-51114-y
[7] Eisaguirre et al. 2020. Trophic redundancy and predator size class structure drive differences in kelp forest ecosystem dynamics.
[8] California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=
[9] Turnbull et. al. "Evaluating the social and ecological effectiveness of partially protected marine areas." *Conservation Biology*, Vol. 35, Issue 3. https://doi.org/10.1111/cobi.13677. 14 January 2021.
[10] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 25 Mar. 2026.
[11] 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.
[12] Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[13] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.
[14]Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[15] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.

On the North Coast, where sheephead and otters are absent, commercial harvest would still primarily remove red urchins rather than the purple urchins driving kelp loss[16],[17]. Scientific Collecting Permits offer a more appropriate tool for targeted purple urchin removal while maintaining network protections and supporting long-term commercial viability of red urchins.

The Petition Would Weaken the MPA Network

SeaSketch analysis shows the petition would reduce habitat connectivity and significantly downgrade the level of protection (LOP) in several MPAs. Point Dume, Swami's, and Point Vicente (currently functioning as a no-take SMR) would fall to "moderate-low" protection levels, undermining spacing and habitat representation guidelines essential to network design[18],[19],[20]. These changes would diminish long-term ecological benefits without evidence that commercial urchin harvest would improve kelp health.

Deny Petition 2023-15MPA: Opening Channel Island MPAs to Allow Take of Highly Migratory Species

The undersigned organizations urge the FGC to reject Petition 2023-15MPA because it conflicts with the goals of the Marine Reserves Working Group (MRWG) that supported the Channel Islands MPA designation process in 2003[21], as well as the goals of the MLPA. The petition also undermines ecosystem protections for highly migratory species (HMS), and creates enforcement challenges. We support CDFW's recommendation to deny the petition.

The proposal would open three no-take SMRs in the Channel Islands (Footprint, Gull Island, and Santa Barbara Island) to commercial fishing for pelagic and HMS species. These Channel Islands MPAs are among the largest, oldest, and most effective in the nation and serve as the "crown jewels" of California's MPA network. Reclassifying them as SMCAs contradicts the original planning goals for the region and the statewide MLPA framework.

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[16] Marine Mammal Commission. "Southern Sea Otter - Marine Mammal Commission." Marine Mammal Commission, Marine Mammal Commission, 2015, www.mmc.gov/priority-topics/species-of-concern/southern-sea-otter/. Accessed 25 Mar. 2026.
[17] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[18]SeaSketch California. 14_7 Point Dune SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/524. Accessed 27 Feb. 2026.
[19] SeaSketch California. 14_9 Swami's SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/526. Accessed 27 Feb. 2026.
[20] SeaSketch California. 14_8 Point Vicente SMCA (no-take) (Take/Designation) Discussion Forum. https://www.seasketch.org/california/app/forums/280/525. Accessed 27 Feb. 2026.
[21] History of the Community-Based Process on Marine Reserves at the Channel Islands National Marine Sanctuary 1999-2001. March 2002. https://nmschannelislands.blob.core.windows.net/channelislands-prod/media/docs/2001-marine-reserves-sac-history.pdf Accessed 25 Mar. 2026.

Inconsistent With MRWG and MLPA Goals

The Channel Islands MPAs were established to protect representative habitats, ecological processes, and ecosystem-level biodiversity, not individual species. The MRWG explicitly designed these reserves to safeguard whole ecosystems, a principle reinforced by past FGC decisions rejecting petitions focused on single species (e.g., the 2020–21 white shark MPA proposal)[22]. Opening MPAs to target HMS contradicts this ecosystem-based mandate.

The petition also conflicts with MLPA Goals 1 and 2, which require protecting marine life abundance and ecosystem integrity. Contrary to the petitioner's claims, HMS are not merely transient visitors, they are apex predators that provide critical top-down structural influence on the marine community. Although wide-ranging, they aggregate at predictable hotspots such as seamounts and fronts, and studies show increases in tuna size and reduced fishing pressure following MPA establishment[23],[24]. By foraging on resident MPA species, HMS gain access to high quality prey without the risk of capture from fishing. Allowing HMS take would remove these benefits and introduce new disturbances such as boat traffic, noise, pollution, and derelict gear that harm non-migratory species the MPAs were designed to protect.

Ecological Importance of Protecting HMS and Pelagics

HMS and pelagic species provide essential ecosystem services[25]. They transport nutrients across ocean regions and act as apex predators that regulate mid-trophic species[26],[27]. Removing them can trigger destabilizing food-web shifts, such as mesopredator booms. In Southern California, declines in sharks and billfish have been linked to increases in Humboldt squid, which then prey heavily on hake, herring, and crustaceans[28]. Allowing HMS fishing in MPAs risks amplifying these cascading effects. Generally, HMS fisheries also frequently catch non-target species, including threatened turtles and seabirds, although hook-and-line, spear, harpoon, and deep set buoy gear is highly selective and generally avoids surface-dwelling species. Introducing take into no-take MPAs would expose protected habitats and species to new risks, undermining the core purpose of the reserves.

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[22] California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022. Appendix G Supplemental Tables.
[23] McDonald, Gavin, et al. "Global Expansion of Marine Protected Areas and the Redistribution of Fishing Effort." *Proceedings of the National Academy of Sciences*, vol. 121, no. 29, 9 July 2024, https://doi.org/10.1073/pnas.2400592121.
[24] Curnick, David J, et al. "Interactions between a Large Marine Protected Area, Pelagic Tuna and Associated Fisheries." Vol. 7, 14 May 2020, https://doi.org/10.3389/fmars.2020.00318
[25] Heithas et al. 2008. Predicting ecological consequences of marine top predator declines.
[26]Bauer, S., and B. J. Hoye. "Migratory Animals Couple Biodiversity and Ecosystem Functioning Worldwide." *Science*, vol. 344, no. 6179, 4 Apr. 2014, https://doi.org/10.1126/science.1242552
[27] Reynolds, Heather L, and Keith Clay. "Migratory species and ecological processes." *Environmental Law*, vol. 41, no. 2, 2011, pp. 371–391. JSTOR, www.jstor.org/stable/43267495, https://doi.org/10.2307/43267495.
[28]Vetter, Russ, et al. Predatory interactions and niche overlap between mako shark, *isurus oxyrinchus*, and jumbo squid, *dosidicus gigas*, in the California Current. *CalCOFI Rep.*, Vol. 49, 2008, oceanrep.geomar.de/id/eprint/53785/1/4444.pdf.

Deny Petition 2023-16: Reclassify Stewart's Point and Bodega Head SMRs as SMCAs to Allow Commercial Salmon Trolling

The undersigned organizations urge the FGC to reject Petition 2023-16MPA because it conflicts with key goals of the MLPA, raises significant scientific concerns, and, according to CDFW, does not align with adaptive management guidance from the DMR. CDFW also notes that the petition contradicts the original purpose of the two SMRs, could create enforcement challenges, and may unintentionally increase pressure on groundfish species.

Conflicts With MLPA Goals

Petition 2023-16 is inconsistent with MLPA Goals 1, 2, and 6. It proposes reducing protections in two SMRs to allow commercial salmon trolling at a time when salmon populations are at historic lows[29], [30]. The commercial salmon fishery has been closed for three consecutive years (2023–2025) due to extremely low abundance driven by multi-year drought, warming waters, harmful algal blooms, and wildfire-related impacts on watersheds. Introducing new fishing pressure in SMRs would add stress to a species already in crisis, directly contradicting MLPA Goal 1, which requires protecting and maintaining species abundance.

The petition also conflicts with MLPA Goal 2, which prioritizes sustaining and rebuilding depleted, economically valuable species. Salmon clearly meet both criteria: they are economically important and severely depleted. Reclassifying SMRs as SMCAs to increase commercial harvest opportunities during a period of population collapse runs counter to the MLPA's conservation mandate. Finally, weakening protections in Stewart's Point and Bodega Head SMRs would undermine the integrity of the statewide MPA network, violating MLPA Goal 6. SMRs serve as the backbone of the network, and reducing their protection level diminishes the connectivity and ecological function the MLPA requires.

Scientific Concerns

While the petition correctly notes that climate change threatens salmon, its proposed action does nothing to address the root causes of salmon decline. Research shows that warming water temperatures and reduced streamflow have harmed salmon throughout their life cycle, contributing to long-term reductions in abundance[31]. Allowing take in SMRs would not mitigate these climate-driven stressors and would remove safeguards that currently allow salmon to recover and safely hunt for prey within those MPAs.

Recent scientific studies underscore the importance of maintaining strong protections. A 2023 study by Hamilton, Kennedy, and colleagues found that MPAs, despite facing climate stressors,

[29] PFMC. 2026. Review of 2025. Ocean Salmon Fisheries.
[30] CDFW. 2026. Chinook Salmon.
[31] Siegel, Jared E. and Crozier, Lisa G. "Impacts of Climate Change on Salmon of the Pacific Northwest: A review of the scientific literature published in 2019". 2020, https://doi.org/10.25923/jke5-c307

can function as climate refugia that buffer species from the worst impacts of warming[32]. Similarly, Smith et al. (2025) examined ecological communities in Central Coast MPAs before, during, and after the 2014–2016 marine heatwaves[33]. While MPAs did not prevent all climate-driven changes, some communities inside MPAs experienced less disruption than reference sites, and MPAs continued to support higher fish biomass, abundance, and diversity even during extreme heat events.

These findings suggest that maintaining the integrity of the existing MPA network is more likely to support the resilience of salmon and HMS under climate change than weakening SMRs to expand commercial fishing allowances. Strong, fully protected areas provide ecological stability that can help species, including salmon, better withstand climate-related pressures.

Deny Three Actions with Petition 2023-18: Modifications to allowed uses at several Santa Barbara Channel MPAs

The undersigned organizations urge the FGC to reject Petition 2023-18MPA because it is inconsistent with the goals of the MRWG and the MLPA and lacks scientific justification for removing protections for seabirds and pinnipeds. We support CDFW's recommendation to deny actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7, which would reduce protections for seabird and pinniped populations and weaken ecological protections. We also support CDFW's recommendation to support action 2023-18MPA_2 to continue support for the Marine Monitor (M2) radar at Point Conception SMR, because it aligns with the goals of the MLPA and the DMR recommendations regarding improving MPA enforcement.

Inconsistent With MRWG and MLPA Goals

Actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7 propose removing the Special Closures on San Miguel Island and Anacapa Island which were established prior to the creation of the MPA network to protect seabird and pinniped populations from human disturbance.[34] San Miguel Island is home to one of the largest pinniped rookeries and haul-out areas in the country and pinnipeds are highly sensitive to disturbance, especially during pupping and breeding, when disturbance can lead to reduced reproductive success or pup abandonment.[35] Similarly,

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[32] Hamilton, Susan L, et al. "Variable Exposure to Multiple Climate Stressors across the California Marine Protected Area Network and Policy Implications." *Ices Journal of Marine Science,* vol. 80, no. 7, 26 July 2023, pp. 1923–1935, https://doi.org/10.1093/icesjms/fsad120.
[33] Smith, Joshua G, et al. "Conservation Benefits of a Large Marine Protected Area Network That Spans Multiple Ecosystems." *Conservation Biology*, 9 Jan. 2025, https://doi.org/10.1111/cobi.14435
[34] National Park Service. "Marine Protected Areas - Channel Islands National Park". https://www.nps.gov/chis/learn/nature/marine-protected-areas.htm. Accessed 23 March 2026.
[35] Lowry, Mark S., Elizabeth M. Jaime, and Jeffrey E. Moore. 2021. Abundance and distribution of pinnipeds at the Channel Islands in southern California, central and northern California, and southern Oregon during summer 2016–2019. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-656. https://doi.org/10.25923/6qhf-0z55

Anacapa Island is home to the largest breeding colony of California brown pelicans in the world[36],[37].

Brown pelicans are extremely sensitive to noise and human disturbance, particularly during nesting when disturbance can cause nest abandonment[38]. Removing protections threatens these sensitive populations and conflicts with MRWG Goal 1 and MLPA Goals 1 and 2 which aim to protect populations of interest and the natural diversity and abundance of marine life.

Conclusion

We urge the FGC to reject Petitions 2023-14, 2023-15, 2023-16, and 2023-18 to ensure that California's marine ecosystems remain resilient, healthy, and protected for future generations.

Thank you for your leadership and for considering these comments.

Sincerely,

Organizations[39]

Tomas Valadez
California Policy Manager
Azul

Kayla Feairheller
CEO and Founder
Bleu World Corporation

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Barbara Brydolf
President Alta Peak Chapter
California Native Plant Society

Sharon Musa
External Affairs Manager
Catalina Island Conservancy

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[36] National Park Service. Restoring Anacapa Island: Seabird Habitat - Channel Islands National Park. https://www.nps.gov/chis/learn/nature/restoring-anacapa-island-sea-bird-habitat.htm. Accessed 24 March 2026.
[37] California Department of Fish and Wildlife. Anacapa Island Special Closure. Version 2, September 2022. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=104293.
[38] Anderson 1998. Dose-response relationships between human disturbance and brown pelican breeding success.
[39] Alphabetical by organization name

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Dan Silver
Executive Director
Endangered Habitats League

Laura Deehan
State Director
Environment California

Pamela Heatherington
Director
Environmental Center of San Diego

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Laura Hunter
Board Member
Escondido Neighbors United

Suzie Fortner
Executive Director
Friends of the Dunes

James Peugh
Chair
Friends of Famosa Slough

Michael Wellborn
Board President
Friends of Harbors, Beaches and Parks

Daniel Watman
Friends of International Friendship Park

Karin Zirk, Ph.D.
Executive Director
Friends of Rose Creek

Carissa Cabrera
Founder
Futuruswell

Val Schull
Water and Ocean Program Director
GreenLatinos

Kerry J. Nickols, Ph.D.
Science and Policy Director
Heal the Bay

Sarah Winter Whelan
Executive Director
Healthy Ocean Coalition

Michael Quill
Marine Programs Director
Los Angeles Waterkeeper

Lance Morgan, PhD
President
Marine Conservation Institute

Sandy Aylesworth
Pacific Initiative Director, Oceans
NRDC

Natalie Johnston
Interpretive Programs Manager
Pacific Grove Museum of Natural History

Janette Luviano
Director of Programs
Sachamama

Adriana Guerrero-Nardone
Executive Director
Salted Roots

Muriel Spooner
Co-Chair Conservation Committee
San Diego Bird Alliance

Michael Blum
Principal
Sea of Clouds

Jack Eidt
Co-Founder
SoCal 350 Climate Action

Joanie Steinhaus
Ocean Program Director
Turtle Island Restoration Network

Katie O'Donnell
Senior Ocean Conservation Manager
WILDCOAST

Individuals[40]

Natalie Borchardt, Senior Manager Natural Resources

MV Eitzel, Professional Researcher at University of California, Davis

[40] Individuals are signing onto this letter for themselves, and are not signing on behalf of their organization. In other words, their affiliation with an organization is not an endorsement by the organization, but only by the individual person.

From: Rick Duenas <[redacted]>
Sent: Monday, April 13, 2026 7:22 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Public comment: April 21, 2026: Northern 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. I am writing regarding the MPA petitions for Del Norte through Monterey Counties. I urge you to deny all of these petitions with one exception for Pyramid Point as noted below.

2023-21: **Accept** the boundary change to the stateline, **deny** the removal of surf smelt take. The petition seems to cite literature from the turn of the century regarding surf smelt decline. CDFW's "Surf Smelt Enhanced Status Report" normalized for unit effort indicates a 2020 abundance trend increasing to levels above the decline of the 1990s. Regardless, if surf smelt were truly declining, the decline should be mitigated via bag limit and season changes, not spatial restrictions.

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

2023-16: **Deny.** I agree with CDFW's recommendation and I am not willing to give up consumptive access in other areas to make a carve out for commercial trollers in a niche area. Also, groundfish bycatch would inevitably occur within the new SMCAs.

2023-32: **Deny.** I agree with CDFW's recommendation. Granting the intertidal protection in concept is okay but does not fix the enforcement problem claimed by the petitioner.

2023-33: **Deny**. I agree with CDFW's recommendation. Barring take from boat-based anglers will do nothing to help protect kelp forests, and kelp forests are unable to grow in much of the proposed boundary areas anyway. Kelp in northern Monterey Bay runs out of light in much shallower water than elsewhere.

2023-23: **Deny.** I agree with CDFW's recommendation. Again, barring take of finfish will do nothing to protect kelp forests in the shale as proposed. Barring take during a "Kelp Restoration Management Permit" period is infeasible and a waste of Department resources to implement and enforce.

In short, please consider denying the vast majority of the northern bin-2 petitions as recommended by CDFW. Thank you.

Sincerely,

Rick Duenas

April 13, 2026

The Honorable Eric Sklar
President, California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Re: April 21st Fish and Game Commission Discussion Regarding Bin 2 Marine Protected Area (MPA) Petitions

Dear President Sklar and Commissioners:

On behalf of the California Sea Urchin Commission (CSUC), I respectfully submit this letter expressing our concern about the process employed by the Fish and Game Commission (Commission) to consider changes to the MPA network. This is not the process that the State and the stakeholders agreed to when considering changes to the network. We believe the current process needs to be abandoned and when resources are available be restarted following the guidance in the MLPA Master Plan. If the Commission decides to proceed with the current flawed process, we oppose all petitions under consideration and support Petition 2023-14MPA, which seeks to authorize targeted commercial take of both purple (Strongylocentrotus purpuratus) and red (Mesocentrotus franciscanus) sea urchins within the following State Marine Conservation Areas: Sea Lion Cove, Stewarts Point, Salt Point, and Double Cone Rock.

MLPA ALIGNMENT
The proposed action advances multiple goals of the Marine Life Protection Act (MLPA), including those listed below.

• Goal 1: To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems
• Goal 2: To help sustain, conserve, and protect marine life populations, including those of economic value
• Goal 3: To improve recreational, educational, and study opportunities provided by marine ecosystems
• Goal 6: To ensure that the state's marine protected areas are designed and managed as a network

Under current conditions, many reef areas within and adjacent to these locations are characterized by persistent urchin barrens and diminished kelp abundance. In such conditions, existing protections are not achieving the intended ecological outcomes of the MLPA.

SCIENTIFIC BASIS
The scientific basis for targeted urchin removal as a management tool is well established. Peer-reviewed research demonstrates that:

• Marine heatwave events and predator loss have contributed to widespread urchin barrens (Rogers-

Bennett and Catton, 2019)
• Urchin removal is a recognized and widely applied kelp restoration strategy (Eger et al., 2022)
• Reductions in urchin density can enable kelp recruitment and recovery under appropriate conditions (Ward et al., 2022)

COASTAL FISHING COMMUNITIES POLICY
In February 2024, the Commission adopted its Coastal Fishing Communities Policy, recognizing the importance of sustaining communities that depend on marine fisheries. The policy defines coastal fishing communities as those that are socially and economically dependent upon commercial and recreational marine harvest and related activities.

The policy was developed in response to documented concerns, including:
• Loss or decline of historic fisheries
• Climate-driven impacts on marine resources
• The need for flexible and adaptive management approaches
• Data limitations that constrain new opportunities

These conditions are directly applicable to the California sea urchin fishery.

The Commission has committed to fostering stability and long-term resilience of coastal fishing communities through its decision-making. Denial of this petition without providing an adaptive pathway for participation would be inconsistent with that commitment.

RECOMMENDATION
Abandon the current flawed process and restart the effort when resources become available to implement the process defined in the Master Plan.

If the Commission decides to proceed, the California Sea Urchin Commission respectfully requests that the Commission approve Petition 2023-14MPA or, in the alternative, advance a structured pilot or adaptive management framework that allows for controlled commercial harvest in these areas.

Thank you for your consideration of this matter.

Respectfully submitted,

David J. Goldenberg
Executive Director
California Sea Urchin Commission

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

April 21, 2026

California Fish and Game Commission

RE: Regional Meeting on Marine Protected Area Petitions – San Mateo to Monterey

Dear President and Members of the Commission,

The Pacific Coast Federation of Fishermen's Associations represents commercial fishing associations from San Diego to Crescent City and works directly with the majority of active commercial fishermen in California. Our members fish across multiple regions, fisheries, and gear types, supporting working waterfronts, coastal communities, and the production of locally harvested seafood.

For generations, commercial fishing has been a way of life. It is how families have supported themselves, how coastal communities have been built, and how fresh, sustainably harvested local seafood has made its way to dinner tables. California fisheries operate within one of the most highly regulated and actively managed systems in the world and provide a low-carbon footprint, domestic food source that should be protected and prioritized.

Unfortunately, reducing commercial fishing harvest is often framed as an environmental win because it is an easy story to tell, and easy for people to believe. This is a narrative that risks prioritizing optics over evidence. Reducing commercial fishing does not inherently increase biodiversity or protect ecosystems. Nor does it address the actual drivers of changing ocean conditions, including ocean warming, habitat degradation, and water quality.

California already has a comprehensive, statewide MPA network developed through a structured public process, and that network remains in an evaluation and adaptive management phase. Expansion of this network should not be considered without first demonstrating how the existing network is performing against clearly defined objectives.

For too long, fisheries regulations have been layered on without evaluating whether they remain necessary or effective. Every time a new issue arises, another restriction is added. Commercial fishing is often used as the default regulatory lever because it is visible and easy to restrict, not because it has been shown to be the primary driver of whatever issues these petitions claim to address.

New, indiscriminate closures can push highly regulated, local food-producing families out of business, weaken coastal communities, and reduce California's food security. Reducing domestic harvest does not reduce demand; it simply shifts production away from one of the most highly regulated and transparent food systems in the world and increases reliance on

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 •
www.pcffa.org

imported seafood from less regulated systems with weaker environmental and labor protections.

More fundamentally, this petition process is not evaluating whether MPAs are needed or appropriate to address any clearly defined problem. Instead, it assumes MPAs are the correct tool and then focuses on how to apply or expand them. MPAs are one management tool, not a substitute for fisheries management, and should not be treated as a default response. Before considering commercial fishing closures, the Commission must evaluate whether existing targeted management tools are already addressing the asserted underlying issues in these petitions.

As reflected in CDFW evaluations, proposals are being advanced without clearly defined problems or adequate analysis showing that expanding MPAs would address them. Ecological outcomes of marine protected areas are variable, context-dependent, and not consistently predictable, yet closures are being proposed without demonstrating that they are needed or effective.

At its core, the current petition process is fragmented and inconsistent, lacking a cohesive statewide framework and a clear, science-based standard applied across proposals. Separate tracks for tribally led and non-tribally led petitions also raise concerns about whether consistent standards are being applied throughout the process.

This regional meeting and those to follow are designed to gather input and perspectives, but they are not a substitute for meaningful community consultation. Input alone is not analysis. Public comment reflects perspectives, but it does not establish whether proposals meet a meaningful standard. Decisions about necessity and effectiveness require evidence and analysis.

This disconnected and prolonged process, has created the opportunity for a one-way expansion of closures and restrictions without clear understanding whether existing closures are effective, should be modified, or if existing restrictions should be re-evaluated. Layering on new closures ignores the actual drivers of change in the ocean and creates a rigid system that undermines the commercial fishing industry, coastal communities, and California's food security.

For generations, the commercial fishing fleets of California have been feeding our communities and beyond, and yet the required considerations of impacts to fishing communities are not being meaningfully applied. These petitions do not include socioeconomic analysis or reflect meaningful consultation with fishing communities, harbor businesses, crews, and processors whose livelihoods depend on these areas. This approach is inconsistent with the Marine Life Management Act and the Commission’s Coastal Fishing Communities Policy, which require

balanced decision making and consideration of both conservation and the communities that depend on marine resources.

PCFFA recommends denial of Petition 2023-23, Petition 2023-32, and Petition 2023-33 because they end access to active fishing grounds and displace fishing families without meeting the standard required to justify additional closures. PCFFA supports Petition 2023-14 and Petition 2023-16 which would maintain commercial fishing access and are consistent with sustainable use of these areas.

Commercial fishing is a managed use of ocean resources that supports domestic food production, working waterfronts, and coastal economies. Fishermen have done their part for conservation and continue to do so. The Commission should deny petitions that restrict commercial fishing access and ensure decisions are rooted in science and based on demonstrated need and measurable outcomes, not assumptions, precautions or optics.

PCFFA supports ocean protection measures grounded in the best available science, focused on clearly defined problems, and appropriately matched to those problems. The Commission must uphold these standards in the decisions ahead as it considers any expansion of commercial fishing closures.

Sincerely,
Lisa Damrosch
Executive Director
Pacific Coast Federation of Fishermen's Associations

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 •
www.pcffa.org

Ventura County Commercial Fishermen's Association
1237 S. Victoria Ave #284
Oxnard, CA 93035
(805) 663-2152
venturacountyfishermen@gmail.com

16th March 2026

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

Subject: **Supporting Petition 2023-14MPA**

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.

Petition 2023-14MPA proposes a targeted regulatory adjustment to allow the commercial take of sea urchins within specific State Marine Conservation Areas (SMCAs).

Unlike petitions that broadly expand Marine Protected Areas (MPAs) without sufficient supporting data, **this proposal is narrowly tailored, grounded in both ecological need and economic reality, and aligned with adaptive management principles.** It seeks to address a well-documented imbalance in marine ecosystems—specifically the overpopulation of sea urchins and the resulting collapse of kelp forests—while also supporting the sustainability of a critical commercial fishery.

For these reasons, this petition warrants approval or, at minimum, serious consideration through the rulemaking process.

Consideration of Socioeconomic Impacts

A notable strength of Petition 2023-14MPA is its acknowledgment of socioeconomic conditions affecting California's commercial fishing industry. The petition documents the severe decline in the sea urchin fishery, noting landings dropped from **4.2 million pounds in 2013 to 284,000 pounds in 2022**, resulting in a federal fishery disaster declaration.

This demonstrates a clear attempt to incorporate economic realities into the proposed regulatory change.

Additionally, by allowing limited commercial access within specific SMCAs, the petition introduces the potential to **redistribute fishing effort more evenly across available areas**, rather than concentrating pressure solely in open zones. This can:

- Relieve pressure on heavily fished open areas
- Improve spatial distribution of fishing effort
- Support economic recovery and stability within the fishery

Importantly, this is not a broad removal of protections, but a **measured adjustment** designed to balance conservation with sustainability.

Scientific Justification and Ecological Rationale

The petition provides a scientifically supported rationale for its proposal, particularly in relation to kelp forest decline and the role of sea urchins in ecosystem imbalance.

It identifies that kelp loss—reported as high as **90% along parts of the California coast**—is strongly linked to overabundant urchin populations following climate-driven changes.

The petition further cites scientific literature, including *Carr et al. (2021)*, indicating that in the absence of natural predators, urchins can exert **negative cascading effects on kelp ecosystems**.

Crucially, the petition introduces the concept that **commercial fishermen can function as surrogate predators**, helping to control urchin populations and reduce grazing pressure. This represents a biologically grounded approach that:

- Addresses a known ecological imbalance
- Supports kelp recovery through active management
- Aligns with ongoing restoration efforts supported by state agencies

Rather than relying solely on passive protection, the petition recognizes that **active intervention may be necessary** under current environmental conditions.

Potential Benefits to Kelp Recovery

Kelp forest recovery is a shared priority across stakeholders, and this petition offers a practical mechanism to support that goal.

By allowing controlled urchin harvest within selected SMCAs, the proposal may:

- Reduce grazing pressure in urchin-dominated areas
- Facilitate natural kelp recruitment and regrowth
- Complement existing restoration efforts funded by agencies such as the Ocean Protection Council

The petition explicitly notes that kelp restoration projects along the North Coast are already showing promise and that this approach could expand those efforts statewide.

This suggests that the proposal is not speculative, but rather **builds upon ongoing, real-world restoration work**.

Adaptive Management and Policy Alignment

Petition 2023-14MPA is strongly aligned with the principles of **adaptive management**, as outlined in California's Marine Life Protection Act (MLPA) Master Plan and the Decadal Management Review.

The petition references:

- The need to address climate change impacts
- The importance of engaging the fishing industry in management solutions
- Recommendations to explore innovative, collaborative approaches to ecosystem management

This proposal can serve as a **model for adaptive management** by demonstrating how:

- Limited, targeted fishing activities can be used as a management tool
- Fisheries can play a role in ecosystem restoration
- Regulations can evolve in response to changing environmental conditions

Importantly, this approach does not undermine the broader MPA framework. Instead, it enhances it by introducing flexibility where ecological conditions warrant intervention.

A Targeted and Non-Contradictory Approach

Support for Petition 2023-14MPA does not conflict with opposition to other MPA expansion proposals. The distinction lies in the **nature and justification of the action**.

This petition:

- Does not broadly expand MPAs or restrict access without analysis
- Is supported by both ecological and socioeconomic considerations
- Proposes a targeted, species-specific management action
- Aligns with existing scientific understanding and restoration efforts

In contrast to petitions that lack data or fail to consider downstream impacts, this proposal demonstrates a **balanced and evidence-informed approach**.

Conclusion

Petition 2023-14MPA represents a thoughtful and targeted response to a well-documented ecological and economic issue. It integrates scientific understanding, acknowledges socioeconomic realities, and aligns with adaptive management principles.

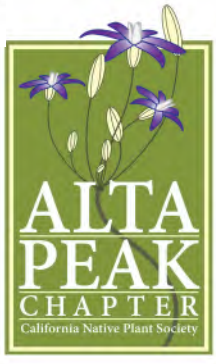
By allowing controlled commercial harvest of overabundant urchins within specific SMCAs, the petition offers a pathway to:

- Support kelp forest recovery
- Improve ecosystem balance
- Relieve pressure on open fishing areas
- Strengthen the resilience of the commercial urchin fishery

For these reasons, and with appropriate oversight and monitoring, **this petition should be approved or advanced for further consideration by the California Fish and Game Commission**.

Respectfully submitted,

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)



Friends of Rose Creek
"Connecting Our Communities"

April 17, 2026

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

Submitted electronically to fgc@fgc.ca.gov

RE: **Agenda Item 3 B and C** - Opposition to Petitions 2023-14, 2023-15, 2023-16, and 2023-18 which would weaken the California MPA Network

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

The undersigned organizations -representing public interest, marine science, environmental conservation, and coastal communities - strongly oppose Petitions 2023-14, 2023-15, 2023-16, and 2023-18 and agree with California's Department of Fish and Wildlife (CDFW)'s recommendations to deny them. These proposals would significantly weaken California's Marine Protected Area (MPA) Network and undermine the ecological integrity that the Marine Life Protection Act (MLPA) was created to protect. In total, the petitions would reduce protections across eighteen MPAs, including six State Marine Reserves (SMRs), two no-take State Marine Conservation Areas (SMCAs), eight SMCAs, and two Special Closure Areas.

We urge the Fish and Game Commission (FGC) to deny petitions that fail to meet the Decadal Management Review (DMR)'s definition of adaptive management: "Guided by the principles of adaptive management, [the first ten-year management review] is an opportunity to evaluate

progress to date, celebrate accomplishments, provide lessons learned, and identify recommendations to strengthen the MPA Network and Management Program going forward."[1]

We oppose these petitions because they:

- **Weaken MPA Network Integrity**
  California's MPA network was intentionally designed using science-based guidelines developed by CDFW and expert scientists to ensure larval connectivity, habitat representation, trophic structure, and ecosystem resilience. Because the network functions as an interconnected system, weakening individual MPAs compromises the entire network and conflicts with the goals of the MLPA. The International Union for Conservation of Nature (IUCN) recognized the network's effectiveness by adding it to the Green List of Protected and Conserved Areas after a seven-year evaluation. Rolling back protections or increasing extractive activities threatens the network's ability to sustain biodiversity and ecological connectivity.

- **Fail to Adhere to Science-Based Guidelines and MLPA Goals**
  The MLPA requires that any modifications to MPAs support its six statutory goals and align with established scientific guidelines[2]. The petitions fail to meet these standards. The network's design was grounded in peer-reviewed research on fish movement, larval dispersal, and population persistence, including spatial population models demonstrating that minimum size and spacing criteria are essential for ecological connectivity. Reducing protections in ways that violate these criteria lacks scientific justification and risks degrading network performance.

  Scientific literature is also clear that adaptive management is intended to strengthen MPAs based on monitoring data, not weaken them[3]. As California enters a critical phase of long-term monitoring and adaptive management, peer-reviewed guidance emphasizes that adaptability means refining protections using new evidence, not making ad hoc reductions. A 2023 global synthesis of 307 MPA design recommendations across 56 publications established "permanence and adaptability" as foundational principles, defining the latter specifically as evidence-based enhancement rather than diminished protection[4].

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[1]California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022, nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209.

[2]California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[3] Van Diggelen, Amanda D., et al. "California's Lessons Learned and Recommendations for Effective Marine Protected Area Network Management." *Marine Policy*, vol. 137, Mar. 2022, p. 104928, https://doi.org/10.1016/j.marpol.2021.104928. 7 January 2022.

[4] Burns, E. S., et al. "Finding harmony in Marine Protected Area design guidelines." *Conservation Science and Practice*. Vol. 5, Issue 6. https://doi.org/10.1111/csp2.12946. 24 April 2023.

- **Do Not Align with the Decadal Management Review (DMR)**
  The state has invested heavily in monitoring and data synthesis, including more than $60 million from the Ocean Protection Council since 2017. Findings from the DMR highlight the need to maintain and enhance resilience in the face of climate change, which is a goal fundamentally incompatible with weakening existing protections.

Deny Petition 2023-14MPA: Opening Sea Urchin Harvest to Commercial Fishing Within Existing MPAs

The undersigned organizations urge the FGC to reject Petition 2023-14MPA. The proposed changes fail to address the underlying drivers of kelp decline, contradicts the core mandates of the MLPA, and would weaken the integrity of the broader MPA network. We support CDFW's recommendation to deny the petition, including its conclusion that the proposal conflicts with the original objectives of the affected MPAs and does not align with adaptive management guidance from the DMR.

The Proposed Action Would Not Address Kelp Loss

The petition seeks to open nine SMCAs to commercial urchin harvest to support kelp restoration. However, purple urchins - the species responsible for kelp barrens - represent only 0.26% of commercial landings and have almost no market value. Red urchins make up 99.73% of landings but are not driving kelp decline[5]. Opening MPAs would therefore incentivize removal of red urchins, not the ecologically harmful purple urchins, and would not meaningfully reduce urchin pressure on kelp forests. Current research instead supports targeted, science-based purple urchin removals using trained divers to minimize ecosystem impacts[6], [7].

The Petition Conflicts With MLPA Goals

The proposal undermines four MLPA goals (1, 2, 5, and 6) by exposing protected species to increased risk, weakening trophic dynamics, and creating enforcement challenges[8]. Allowing commercial take within MPAs increases confusion and accidental take, contradicting the MLPA's requirement for clear, enforceable protections[9]. Multiple gear types can be used to take urchins[10], and vessels can carry or switch gear, making it difficult for wardens to verify

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[5] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[6] Bennet and Caton,2019. Marine heat wave and multiple stressors tip bull kelp forest to sea urchin barrens.https://www.nature.com/articles/s41598-019-51114-y
[7] Eisaguirre et al. 2020. Trophic redundancy and predator size class structure drive differences in kelp forest ecosystem dynamics.
[8] California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=
[9] Turnbull et. al. "Evaluating the social and ecological effectiveness of partially protected marine areas." *Conservation Biology*, Vol. 35, Issue 3. https://doi.org/10.1111/cobi.13677. 14 January 2021.
[10] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 25 Mar. 2026.

compliance within SMCAs[11]. Increasing allowable take in MPAs with already complex rules runs counter to MLPA Goal 5 and to the DMR's emphasis on improving,not weakening, management effectiveness.

In Southern California MPAs, intact trophic cascades have been shown to support kelp resilience during marine heatwaves[12],[13]. In these systems, predators such as lobsters and sheephead naturally regulate urchin populations [14],[15]. Opening these MPAs to commercial urchin harvest would erode these predator-prey relationships.
On the North Coast, where sheephead and otters are absent, commercial harvest would still primarily remove red urchins rather than the purple urchins driving kelp loss[16],[17]. Scientific Collecting Permits offer a more appropriate tool for targeted purple urchin removal while maintaining network protections and supporting long-term commercial viability of red urchins.

The Petition Would Weaken the MPA Network

SeaSketch analysis shows the petition would reduce habitat connectivity and significantly downgrade the level of protection (LOP) in several MPAs. Point Dume, Swami's, and Point Vicente (currently functioning as a no-take SMR) would fall to "moderate-low" protection levels, undermining spacing and habitat representation guidelines essential to network design[18],[19],[20]. These changes would diminish long-term ecological benefits without evidence that commercial urchin harvest would improve kelp health.

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[11] 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.
[12] Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[13] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.
[14]Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[15] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.

[16] Marine Mammal Commission. "Southern Sea Otter - Marine Mammal Commission." Marine Mammal Commission, Marine Mammal Commission, 2015, www.mmc.gov/priority-topics/species-of-concern/southern-sea-otter/. Accessed 25 Mar. 2026.
[17] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[18]SeaSketch California. 14_7 Point Dune SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/524. Accessed 27 Feb. 2026.
[19] SeaSketch California. 14_9 Swami's SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/526. Accessed 27 Feb. 2026.
[20] SeaSketch California. 14_8 Point Vicente SMCA (no-take) (Take/Designation) Discussion Forum. https://www.seasketch.org/california/app/forums/280/525. Accessed 27 Feb. 2026.

Deny Petition 2023-15MPA: Opening Channel Island MPAs to Allow Take of Highly Migratory Species

The undersigned organizations urge the FGC to reject Petition 2023-15MPA because it conflicts with the goals of the Marine Reserves Working Group (MRWG) that supported the Channel Islands MPA designation process in 2003[21], as well as the goals of the MLPA. The petition also undermines ecosystem protections for highly migratory species (HMS), and creates enforcement challenges. We support CDFW's recommendation to deny the petition.

The proposal would open three no-take SMRs in the Channel Islands (Footprint, Gull Island, and Santa Barbara Island) to commercial fishing for pelagic and HMS species. These Channel Islands MPAs are among the largest, oldest, and most effective in the nation and serve as the "crown jewels" of California's MPA network. Reclassifying them as SMCAs contradicts the original planning goals for the region and the statewide MLPA framework.

Inconsistent With MRWG and MLPA Goals

The Channel Islands MPAs were established to protect representative habitats, ecological processes, and ecosystem-level biodiversity, not individual species. The MRWG explicitly designed these reserves to safeguard whole ecosystems, a principle reinforced by past FGC decisions rejecting petitions focused on single species (e.g., the 2020–21 white shark MPA proposal)[22]. Opening MPAs to target HMS contradicts this ecosystem-based mandate.

The petition also conflicts with MLPA Goals 1 and 2, which require protecting marine life abundance and ecosystem integrity. Contrary to the petitioner's claims, HMS are not merely transient visitors, they are apex predators that provide critical top-down structural influence on the marine community. Although wide-ranging, they aggregate at predictable hotspots such as seamounts and fronts, and studies show increases in tuna size and reduced fishing pressure following MPA establishment[23],[24]. By foraging on resident MPA species, HMS gain access to high quality prey without the risk of capture from fishing. Allowing HMS take would remove these benefits and introduce new disturbances such as boat traffic, noise, pollution, and derelict gear that harm non-migratory species the MPAs were designed to protect.

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[21] History of the Community-Based Process on Marine Reserves at the Channel Islands National Marine Sanctuary 1999-2001. March 2002. https://nmschannelislands.blob.core.windows.net/channelislands-prod/media/docs/2001-marine-reserves-sac-history.pdf Accessed 25 Mar. 2026.

[22] California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022. Appendix G Supplemental Tables.

[23] McDonald, Gavin, et al. "Global Expansion of Marine Protected Areas and the Redistribution of Fishing Effort." *Proceedings of the National Academy of Sciences*, vol. 121, no. 29, 9 July 2024, https://doi.org/10.1073/pnas.2400592121.

[24] Curnick, David J, et al. "Interactions between a Large Marine Protected Area, Pelagic Tuna and Associated Fisheries." Vol. 7, 14 May 2020, https://doi.org/10.3389/fmars.2020.00318

Ecological Importance of Protecting HMS and Pelagics

HMS and pelagic species provide essential ecosystem services[25]. They transport nutrients across ocean regions and act as apex predators that regulate mid-trophic species[26],[27]. Removing them can trigger destabilizing food-web shifts, such as mesopredator booms. In Southern California, declines in sharks and billfish have been linked to increases in Humboldt squid, which then prey heavily on hake, herring, and crustaceans[28]. Allowing HMS fishing in MPAs risks amplifying these cascading effects. Generally, HMS fisheries also frequently catch non-target species, including threatened turtles and seabirds, although hook-and-line, spear, harpoon, and deep set buoy gear is highly selective and generally avoids surface-dwelling species. Introducing take into no-take MPAs would expose protected habitats and species to new risks, undermining the core purpose of the reserves.

Deny Petition 2023-16: Reclassify Stewart's Point and Bodega Head SMRs as SMCAs to Allow Commercial Salmon Trolling

The undersigned organizations urge the FGC to reject Petition 2023-16MPA because it conflicts with key goals of the MLPA, raises significant scientific concerns, and, according to CDFW, does not align with adaptive management guidance from the DMR. CDFW also notes that the petition contradicts the original purpose of the two SMRs, could create enforcement challenges, and may unintentionally increase pressure on groundfish species.

Conflicts With MLPA Goals

Petition 2023-16 is inconsistent with MLPA Goals 1, 2, and 6. It proposes reducing protections in two SMRs to allow commercial salmon trolling at a time when salmon populations are at historic lows[29], [30]. The commercial salmon fishery has been closed for three consecutive years (2023–2025) due to extremely low abundance driven by multi-year drought, warming waters, harmful algal blooms, and wildfire-related impacts on watersheds. Introducing new fishing pressure in SMRs would add stress to a species already in crisis, directly contradicting MLPA Goal 1, which requires protecting and maintaining species abundance.

The petition also conflicts with MLPA Goal 2, which prioritizes sustaining and rebuilding depleted, economically valuable species. Salmon clearly meet both criteria: they are economically important and severely depleted. Reclassifying SMRs as SMCAs to increase commercial harvest opportunities during a period of population collapse runs counter to the

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[25] Heithas et al. 2008. Predicting ecological consequences of marine top predator declines.
[26]Bauer, S., and B. J. Hoye. "Migratory Animals Couple Biodiversity and Ecosystem Functioning Worldwide." *Science*, vol. 344, no. 6179, 4 Apr. 2014, https://doi.org/10.1126/science.1242552
[27] Reynolds, Heather L, and Keith Clay. "Migratory species and ecological processes." *Environmental Law*, vol. 41, no. 2, 2011, pp. 371–391. JSTOR, www.jstor.org/stable/43267495, https://doi.org/10.2307/43267495.
[28]Vetter, Russ, et al. Predatory interactions and niche overlap between mako shark, *isurus oxyrinchus*, and jumbo squid, *dosidicus gigas*, in the California Current. *CalCOFI Rep.*, Vol. 49, 2008, oceanrep.geomar.de/id/eprint/53785/1/4444.pdf.
[29] PFMC. 2026. Review of 2025. Ocean Salmon Fisheries.
[30] CDFW. 2026. Chinook Salmon.

MLPA's conservation mandate. Finally, weakening protections in Stewart's Point and Bodega Head SMRs would undermine the integrity of the statewide MPA network, violating MLPA Goal 6. SMRs serve as the backbone of the network, and reducing their protection level diminishes the connectivity and ecological function the MLPA requires.

Scientific Concerns

While the petition correctly notes that climate change threatens salmon, its proposed action does nothing to address the root causes of salmon decline. Research shows that warming water temperatures and reduced streamflow have harmed salmon throughout their life cycle, contributing to long-term reductions in abundance[31]. Allowing take in SMRs would not mitigate these climate-driven stressors and would remove safeguards that currently allow salmon to recover and safely hunt for prey within those MPAs.

Recent scientific studies underscore the importance of maintaining strong protections. A 2023 study by Hamilton, Kennedy, and colleagues found that MPAs, despite facing climate stressors, can function as climate refugia that buffer species from the worst impacts of warming[32]. Similarly, Smith et al. (2025) examined ecological communities in Central Coast MPAs before, during, and after the 2014–2016 marine heatwaves[33]. While MPAs did not prevent all climate-driven changes, some communities inside MPAs experienced less disruption than reference sites, and MPAs continued to support higher fish biomass, abundance, and diversity even during extreme heat events.

These findings suggest that maintaining the integrity of the existing MPA network is more likely to support the resilience of salmon and HMS under climate change than weakening SMRs to expand commercial fishing allowances. Strong, fully protected areas provide ecological stability that can help species, including salmon, better withstand climate-related pressures.

Deny Three Actions with Petition 2023-18: Modifications to allowed uses at several Santa Barbara Channel MPAs

The undersigned organizations urge the FGC to reject Petition 2023-18MPA because it is inconsistent with the goals of the MRWG and the MLPA and lacks scientific justification for removing protections for seabirds and pinnipeds. We support CDFW's recommendation to deny actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7, which would reduce protections for seabird and pinniped populations and weaken ecological protections. We also support CDFW's recommendation to support action 2023-18MPA_2 to continue support for the Marine

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[31] Siegel, Jared E. and Crozier, Lisa G. "Impacts of Climate Change on Salmon of the Pacific Northwest: A review of the scientific literature published in 2019". 2020, https://doi.org/10.25923/jke5-c307

[32] Hamilton, Susan L, et al. "Variable Exposure to Multiple Climate Stressors across the California Marine Protected Area Network and Policy Implications." *Ices Journal of Marine Science,* vol. 80, no. 7, 26 July 2023, pp. 1923–1935, https://doi.org/10.1093/icesjms/fsad120.

[33] Smith, Joshua G, et al. "Conservation Benefits of a Large Marine Protected Area Network That Spans Multiple Ecosystems." *Conservation Biology*, 9 Jan. 2025, https://doi.org/10.1111/cobi.14435

Monitor (M2) radar at Point Conception SMR, because it aligns with the goals of the MLPA and the DMR recommendations regarding improving MPA enforcement.

Inconsistent With MRWG and MLPA Goals

Actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7 propose removing the Special Closures on San Miguel Island and Anacapa Island which were established prior to the creation of the MPA network to protect seabird and pinniped populations from human disturbance.[34] San Miguel Island is home to one of the largest pinniped rookeries and haul-out areas in the country and pinnipeds are highly sensitive to disturbance, especially during pupping and breeding, when disturbance can lead to reduced reproductive success or pup abandonment.[35] Similarly, Anacapa Island is home to the largest breeding colony of California brown pelicans in the world[36],[37].

Brown pelicans are extremely sensitive to noise and human disturbance, particularly during nesting when disturbance can cause nest abandonment[38]. Removing protections threatens these sensitive populations and conflicts with MRWG Goal 1 and MLPA Goals 1 and 2 which aim to protect populations of interest and the natural diversity and abundance of marine life.

Conclusion

We urge the FGC to reject Petitions 2023-14, 2023-15, 2023-16, and 2023-18 to ensure that California's marine ecosystems remain resilient, healthy, and protected for future generations.

Thank you for your leadership and for considering these comments.

Sincerely,

40 Organizations[39]

Tomas Valadez
California Policy Manager
Azul

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[34] National Park Service. "Marine Protected Areas - Channel Islands National Park". https://www.nps.gov/chis/learn/nature/marine-protected-areas.htm. Accessed 23 March 2026.
[35] Lowry, Mark S., Elizabeth M. Jaime, and Jeffrey E. Moore. 2021. Abundance and distribution of pinnipeds at the Channel Islands in southern California, central and northern California, and southern Oregon during summer 2016–2019. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-656. https://doi.org/10.25923/6qhf-0z55
[36] National Park Service. Restoring Anacapa Island: Seabird Habitat - Channel Islands National Park. https://www.nps.gov/chis/learn/nature/restoring-anacapa-island-sea-bird-habitat.htm. Accessed 24 March 2026.
[37] California Department of Fish and Wildlife. Anacapa Island Special Closure. Version 2, September 2022. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=104293.
[38] Anderson 1998. Dose-response relationships between human disturbance and brown pelican breeding success.
[39] Alphabetical by organization name

Neil Nathan
Project Scientist
Benioff Ocean Science Laboratory

Kayla Feairheller
CEO and Founder
Bleu World Corporation

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Barbara Brydolf
President Alta Peak Chapter
California Native Plant Society

Sharon Musa
External Affairs Manager
Catalina Island Conservancy

Suzanne Hume
Educational Director & Founder
CleanEarth4Kids.org

Dan Silver
Executive Director
Endangered Habitats League

Laura Deehan
State Director
Environment California

Pamela Heatherington
Director
Environmental Center of San Diego

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Laura Hunter
Board Member
Escondido Neighbors United

Suzie Fortner
Executive Director
Friends of the Dunes

James Peugh
Chair
Friends of Famosa Slough

Michael Wellborn
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Daniel Watman
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Program Director
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Kerry J. Nickols, Ph.D.
Science and Policy Director
Heal the Bay

Sarah Winter Whelan
Executive Director
Healthy Ocean Coalition

Sofia Barboza
Ocean and Coasts Program Manager
Hispanic Access Foundation

Mia Glover
Program Manager
Inland Ocean Coalition

Michael Quill
Marine Programs Director
Los Angeles Waterkeeper

Lance Morgan, PhD
President
Marine Conservation Institute

Dr. Sylvia Earle
Chairman, Founder and President
Mission Blue

Natalie Herendeen
Executive Director
Monterey Waterkeeper

Miriam Goldstein
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Natalie Johnston
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Pacific Grove Museum of Natural History

Janette Luviano
Director of Programs
Sachamama

Adriana Guerrero-Nardone
Executive Director
Salted Roots

Muriel Spooner
Co-Chair Conservation Committee
San Diego Bird Alliance

Jeanne Sparks and Ken Hough
Co-Executive Directors
Santa Barbara County Action Network

Michael Blum
Principal
Sea of Clouds

Jack Eidt
Co-Founder
SoCal 350 Climate Action

Joanie Steinhaus
Ocean Program Director
Turtle Island Restoration Network

Katie O'Donnell
Senior Ocean Conservation Manager
WILDCOAST

2 Individuals[40]

Natalie Borchardt, Senior Manager Natural Resources

MV Eitzel, Professional Researcher at University of California, Davis

[40] Individuals are signing onto this letter for themselves, and are not signing on behalf of their organization. In other words, their affiliation with an organization is not an endorsement by the organization, but only by the individual person.

CALPIRG Students

Dear California Fish and Game Commission, Governor Newsom, and Secretary Crowfoot,

Our ocean is in trouble. After decades of industrial fishing and new impacts from marine heat waves, many of the most beloved species are disappearing. One of the best things we can do to protect our ocean is protect critical habitats like kelp forests and rocky reefs. Marine protected areas, which prohibit destructive activities and allow ocean ecosystems to recover, give our ocean and our earth the best chance.

Our marine protected areas help give safe havens for the animals in the area, like the California Sea Lion, our iconic Elephant Seals, and the adorable Harbor Seals which all use the Channel Islands National Marine Sanctuary. They also protect others along the coast: the Southern Sea Otters which rely on the kelp forests in our MPAs, the humongous Mola Mola which live in and around the Point Lobos SMR, our protected Abalone which live in MPAs like Sea Lion Cove SMCA and the Edward F. Ricketts SMCA.

As a student-directed and student-funded organization representing over 25,000 dues-paying student members in the state of California, we're urging you to take action to protect our ocean and our futures. We are proud of much of the work our state has been doing to protect nature, but in order to follow through on the vision of our state outlined in the Nature Based Solutions Executive Order N-82-20, and Senate Bill 337 (to conserve 30 percent of California's lands and coastal waters by 2030), we need to take further action.

As our planet changes, so must our approach to managing our oceans. Over the past three years, we've engaged with Californians up and down the state, from our inland schools, to the coasts, and have seen overwhelming public support, especially from students. After all, it will be today's youth that will be most impacted by the decisions made in the MPA Decadal Management Review process.

Therefore, we are hereby stating our support for the following petitions to be approved:

- Petition # 2023-32
- Petition # 2023-33
- Petition # 2023-23

We are hereby recommending denying the following petitions:

- Petition # 2023-14
- Petition # 2023-16

Best,
Jake Twomey, CALPIRG Students Board Chair
Felix Boulton, CALPIRG Students Chapter Chair at UC Santa Cruz
Neha Janz, CALPIRG Students Chapter Chair at UC Davis
Breckin Caulfield, CALPIRG Students Chapter Chair at UC Berkeley

CALPIRG Students

Since January of 2023, CALPIRG Students has:

- Educated over 131,000 students and community members about marine protected areas and the opportunity to strengthen ocean protections. This happened through face to face conversations at public education events and during class presentations across eight UC campuses.
- 755 people have volunteered on the campaign.
- 21,276 have signed petitions in support of strengthening and expanding California's network of marine protected areas.
- 37 faculty and key voices have signed on.
- Students earned coverage in news outlets 38 times to reach more Californians about the campaign.

CALPIRG Students

Voices for our Oceans

To: Governor Gavin Newsom, CA Fish and Game Commission,

While approximately 16% of California's coastal waters are conserved, only 12% have the level of protection scientists say is needed to defend against biodiversity loss and climate impacts. California's unique network of 124 Marine Protected Areas (MPAs) makes the state a global leader in protecting the critical habitats and life existing in and around our oceans. However, with a warming planet, and historic species extinctions, it is clear that California must strengthen and expand our existing network of protections with highly and fully protected MPAs. Highly protected areas only allow light extractive activities, while fully protected areas do not allow any extractive or environmentally destructive activities. **I am asking you to call for the adoption of more highly and fully protected marine areas, which must be the standard for protecting 30% of our ocean by 2030.**

Sincerely,

Name	Title	Quote of Support
David Checkley	Emeritus Professor, UCSD, Scripps Institution of Oceanography	The ocean is an integral and essential part of planet Earth. It must be protected to ensure its continued ecosystem services to the humankind, from food to recreation to the air we breath, the wind we feel and use and the water we need.
Dimitri Deheyn	Research Scientist, Marine Biology Research Division, Scripps Oceanography, UC San Diego	Coastal MPAs are the lungs of the oceans and the planet. They are key for valuable resources supporting society!
Julia Diaz	Associate Professor, Scripps Institution of Oceanography	The ocean provides natural services that support our daily lives. Protecting the ocean is protecting people.
Tobias Fischer	Professor and Director of the Earth Research Institute, UCSB	When I go into the ocean, I feel the vastness of the water all around me with its calming effect. This water is precious for our living planet and for that reason we must protect it.
Suellen Hopfer	Associate Professor of Public Health, UCI	The ocean is a vital resource for human life

CALPIRG Students

Name	Title	Quote of Support
Gregory F. Grether	Professor, Ecology and Evolutionary Biology, UCLA	As an ecologist, I know the value of marine ecosystems, and as a scuba diver, I have seen the devastating consequences of leaving them unprotected.
Alejandro Camacho	Professor, UCLA Law	It is vital for virtually all life on the planet
Adrian Borsa	Professor, UC San Diego, , Scripps Institution of Oceanography	N/A
Ahmyia Cacapit	PhD Candidate at Scripps Institution of Oceanography	The ocean is vital to maintain biodiversity, cultural heritage, and socioeconomic security for many communities. Sustaining healthy marine ecosystems is necessary to secure a prosperous future.
Emma Combs	President / University of San Diego Sustainability Club	The ocean is not only a precious resource but a work of art that we can all enjoy. The ocean can bring bipartisan support together.
Jessica Toth	Executive Director, Solana Center for Environmental Innovation	We don't want to see our land-based litter become marine debris. That's why Solana Center for Environmental Innovation's vision is a world with oceans and landfills free of discarded valuable resources.
Megan Kassebaum	Co-President, Seal Society at UC San Diego	The ocean provides so much for us humans and its importance is overlooked. While often reduced to the beach and the fish we consume, the ocean is an integral part of our interconnected environment, and damaging the ocean has widespread and hidden detrimental consequences. Creating these MPA is crucial in preserving the rich biodiversity, economic benefits, and global

CALPIRG Students

Name	Title	Quote of Support
		processes the Pacific Ocean provides.
Robin Fator	Marketing and Development Manager	I swim, boogie board, and surf in the San Elijo MPA. Clean water, protection for plants and animals, and a thriving ecosystem make spending time at the beach an amazing experience. It is inspiring to see what this level of protection offers marine life. I love seeing schools of fish, flocks of birds, and thriving tidepools. Please protect the ocean, it is vital to our existence!
Nan Renner	I cannot speak for my organization. I share professional information here for identification purposes only. I serve as Senior Director of Strategic Partnerships, Birch Aquarium at Scripps Oceanography	The ocean makes like possible on our amazing Earth! We live on an ocean planet, with 71% of the surface covered by the ocean. We should protect biodiversity and ecosystems simply because they exist. Also, ocean protection and healthy marine habitats will help mitigate climate change. We need to restore and regenerate damaged ecosystems for current and future generations. I love the ocean because ocean life blows my mind, expands my heart and makes me feel connected with the living planet. I swim in MPAs frequently. They are a refuge for me too.
Glen MacDonald PhD	Professor / UCLA, Professor of Geography	It is impossible to articulate the importance of the ocean in a sentence - it is central to human existence.
Gregory F. Grether	Professor, Ecology & Evolutionary Biology, UCLA	
Muriel Spooner	Co-chair Conservation Committee/San Diego Bird Alliance	The ocean supports a treasure trove of seabirds and shorebirds.

CALPIRG Students

Name	Title	Quote of Support
		They are heavily impacted by human activity and marine protected areas is vital to preserve these birds. Good for birds, good for people, good for the planet.
Kim Stanley Robinson	Writer, self employed	See “Ministry For The Future”
Malik Ayesh	Night Market Coordinator	If you go to the gym like me you’ll know you don’t want to rely on lactic acid fermentation to work out!
Xocoyotzín Torres	Chĭcano at Large	As an Indigenous person, stewardship of the land and waters is vital to ensure the wellness of the seventh generation from today. Protect our planet today, for the future.
Emiliano Gomez	Academic/UC Berkeley	We all depend on it
Elizabeth Hoover	Associate Professor, Environmental Science, Policy & Management	
Tae-Yeoun Keum	Assistant Professor of Political Science, UCSB	As we grapple with the crisis of a warming planet, oceans and their delicate ecosystems remain some of the most vulnerable, yet least understood, areas of our shared world. Protecting our oceans is a foundational, non-negotiable element of any effort to chart out a sustainable future for future generations.
Ejaaz Mason	Lecturer in Earth Systems, Stanford University	I come from New Orleans, LA, one of the most unique and historically relevant places in the U.S. So much of our nation's history and present have come from my hometown. But year after year I have to watch helplessly as my city and the surrounding areas are consumed by rising seas. Each year during hurricane season I wait nervously

CALPIRG Students

Name	Title	Quote of Support
		hoping that another Hurricane Katrina won't completely decimate all that I love and hold dear. And as our ineffective state and federal government, dominated by those who still call climate change a hoax, continue to do nothing but exacerbate my city's environmental challenges, I fear that in no time at all it might be too late to save New Orleans. But it's not too late to fight for my hometown and definitely not too late to fight for coastal communities in my new home of California. Now is the time to act to save not only my home but all of the coastal communities around the world. As a leader of not only America but the entire world, California needs to be a shining example of what environmental sustainability can look like. So let's fight. Now, now, NOW!
Chase Hobbs-Morgan	Lecturer, UC Berkeley Geography	
Daphnie Sicre	Assistant Professor, UCR, Theatre, Film & Digital Production	As a former scuba diver, I have always loved the ocean and all the creature who live in it. We need to respect them and take care of them- there is only ONE!
Grace Wu	Assistant Professor, UCSB	It is where life originated, flourished, diversified and it remains home to a vast array of life on earth.

CALPIRG Students

Voices for our Ocean (Extended)

Our oceans are amazing. In the Arctic Sea, polar bears hunt on ice floats. In the Atlantic, beaked whales surface for air, then dive thousands of yards underwater. Shelves of rock, layered with barnacles, seaweed, and snails, form habitats for sand crabs, striped bass, and lobster. In the Pacific, 15-foot long octopuses climb over boulders. And in oceans across the globe, coral reefs and give rise to thriving underwater communities, where sharks hunt, sea turtles glide, and seals forage.

But our oceans, and all the marine life they hold, face increasing risk:

1. Stop drilling: When we drill, we spill -- and black, sticky oil drowns birds and extinguishes vibrant underwater habitats. We need to stop offshore drilling in America's oceans.
2. Reduce plastics: Whales, seabirds, dolphins, and sea turtles all face health risks from the plastic pollution. We need to ban single-use plastic bags, foam cups, and foam takeout containers and tackle the larger problem of plastic waste
3. Protect threatened species: Acoustic noise, as well as certain fishing and shipping practices, threaten the health and safety of our marine mammals. We should stand up for our sea's most vulnerable animals and work to win policies that will protect our endangered ocean species.
4. Create protected areas: One of the best ways to replenish fish populations, protect ocean habitats and marine species, and build ocean resiliency in the face of climate change is to protect key habitats that sustain ocean life. In pursuit of fulfilling California's pledge to conserve 30% of our land and coastal waters by 2030, we support protecting 30% of our ocean are highly or fully protected.

We want to keep our oceans healthy and our sea animals safe so future generations can experience and wonder at the beauty of our seascapes. That's why we support added protections for our oceans.

Name	Title	Quote of Support
Jodi Charrier	Natural Resource Management Specialist, NMFS, Santa Rosa	I'm passionate about conservation.
KC Fockler	Surfrider Foundation, Education Coordinator for North Orange County, Huntington Beach	
Mitch Silverstein	San Diego County Policy Coordinator, The Surfrider Foundation, Oceanside	
Hansika Nath	International Student	I believe Climate Change and Environment conservation should

Name	Title	Quote of Support
	Representative, USAC, Los Angeles	be a global priority at this point however the lack of initiatives and efforts in the government spaces are appalling. I believe CALPIRG and this program is a step in the right direction!
Phoebe Chiu	Undergraduate Student Association Council Facilities Commissioner, Los Angeles	My name is Phoebe Chiu (she/her). I am an elected council member of UCLA and a long-term California resident, born in Oakland, raised in the San Francisco Bay Area, and attending UCLA. I vouch for increasing the number of California Marine Protected Areas (MPAs) to 30% of the coastline in this year's internal review process for the 30x30 Plan occurring within the California Department of Fish and Wildlife ending in April 2023. One of my favorite activities in California is visiting the tidepools by the beaches in Monterey and seeing the thriving wildlife. For me, marine life is one of the prettiest sights in California, and I want more of our community to have the opportunity to experience the natural beauties of our state by expanding the number of MPAs. Beyond that, the ocean is a critical tool to tackle climate change, with wetlands and seagrasses absorbing five times the carbon of land-based forests and wetland ecosystems being more protective than constructed seawalls. Also, while the fishing industry might provide pushback on increasing MPAs, protecting marine life is critical for ensuring a healthy fish population, especially if fish migrate closer to the polls if we allow the temperatures of our oceans to rise due to a lack of protection. Lastly, over 40% of the US population lives in coastal counties, and nearly 75% of coastal areas do not have adequate plans to address future sea level rise, which could be up to 6 ft. California is not immune to this issue. Therefore, I want to become a Voice for Our Oceans to call upon the California Department of Fish and Wildlife to consider younger and future generations at risk of displacement if we do not overhaul our plans to protect our homes and ocean.
Kristin Dobbin	Assistant professor of Cooperative Extension, Berkeley	It is critical that we follow our youth leaders in protecting our oceans and their futures
Kate Harrison	Councilmember, Berkeley City Council	They are the heart of our ecosystem.
Yan Zhao	Vice Mayor, City of Saratoga	According to scientists' research, at least 30% of California must be protected in order to protect the state from environmental collapse. Our oceans are obviously incredible homes to lots of

Name	Title	Quote of Support
		beautiful creatures. It's our duty and obligation to protect our oceans so that we can save the earth for the generation to come.
Maddalena Bearzi	President and co-founder of Ocean Conservation Society, Marina del Rey	At Ocean Conservation Society, we have been studying dolphins and whales off Southern California for over 25 years – one of the longest-running investigations on marine mammals worldwide. We believe that protecting the areas frequented by these animals, and including them in the design and expansion of MPAs and MPA networks, is essential to ensure that the connection between critical habitats remains unbroken.

CALPIRG Students

Community Engagement and Education

UC San Diego Students host a press conference with speakers from Scripps Institution of Oceanography, to educate the public about the success of existing marine protected areas in protecting biodiversity, and the need to expand MPAs in California.

UCSB students hold a news conference in advance of going to Sacramento. Leona Gomez, a senior majoring in communications, tells the UCSB audience that conservation depends on both individuals engaging civically and government support.

CALPIRG Students

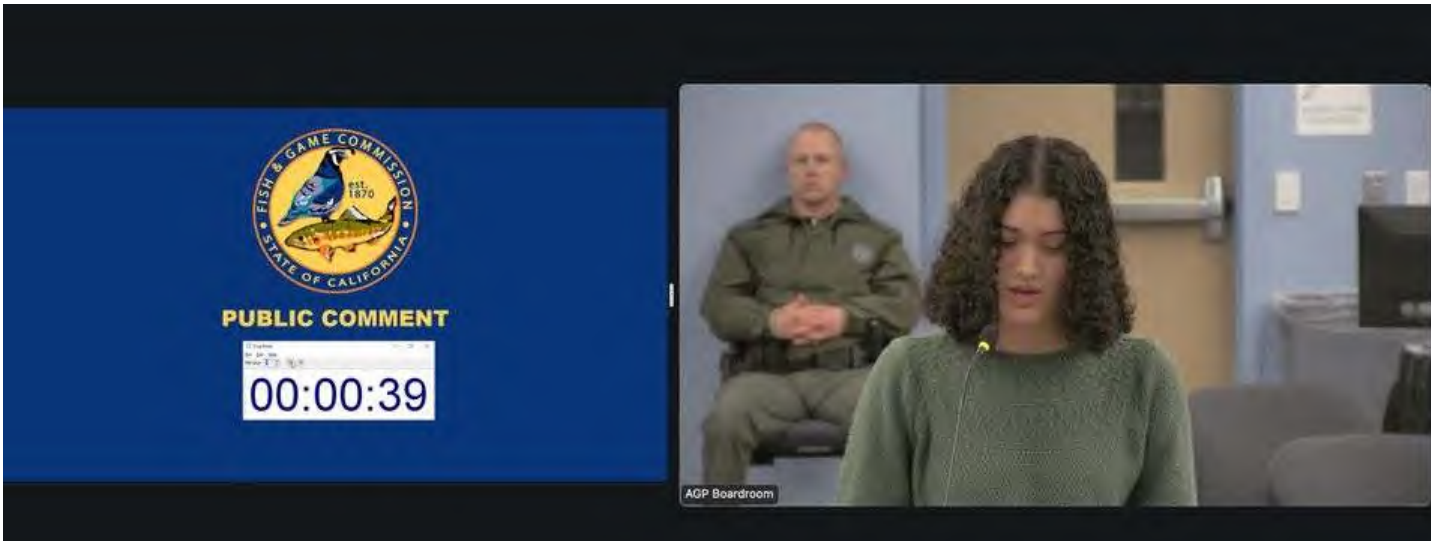
Students from CALPIRG Students at UC Berkeley gather outside the CA Natural Resources Agency (top), UC Berkeley student Bella Ibarra testifies in support of expanded marine protection areas (bottom, middle).

Clara Castronovo and Caia Lomeli delivered support to the acting director of the Ocean Protection Council, Jenn Eckerle. March 2023

CALPIRG Students Board Chair, Clara Castronovo, delivers support to decision makers at an international conference on Marine Protected Areas (IMPAC5) in Vancouver, Canada. Spring 2023

CALPIRG Students

Above: CALPIRG students (from left) Toby Ngo, Byul Sak, and Kate Burkhardt testify in favor of expanded Marine Protected Areas. Bottom: CALPIRG students and staff take a photo with CA Fish and Game Commissioners - 2023



Student leader at UC Davis, Neha Janz, speaks to the FGC on ocean protections on behalf of her campus.

CALPIRG Students

We hosted big events to engage the public and spread awareness:

- Organized Ocean Day 2023 with Environment California, and partners like Surfrider, Oceana, and Azul - and had 200 people in attendance.
- Generated media attention during Earth Day events
- 100 video interviews of student comments on why we need increase ocean protections

CALPIRG Students at an event to celebrate Marine Protected Areas and California's actions on ocean conservation with California's Senate President pro Tempore Toni G. Atkins.

CALPIRG Students

UC Davis chapter hosts educational events to call for stronger ocean protections. Spring 2025

Left: UCLA chapters tabling to sign up new members behind the campaign to expand marine protections in California. February, 2023 - Right: CALPIRG volunteers make recruitment announcements in lecture halls at UCLA, March 2026

"Water your fave things about the ocean" campaign event at UCSB. Campaign Rally for the oceans at UC Davis. Spring 2026

CALPIRG Students

CALPIRG's Ocean Rally at UCLA in February (bottom) and April (top) 2026.

UC Santa Barbara students pass a resolution in support of expanded and strengthened marine protected areas, after engaging thousands of students on their campus around the issue. February 2026

CALPIRG Students

CALPIRG activists also educated middle school students in the Los Angeles area about the benefits of MPAs for endangered species. Over 200 students and their teachers participated in a lesson about the endangered Southern Sea Otter and the importance of habitat protection through Marine Protected Areas! April, 2025

UC Santa Cruz (left) and UC San Diego volunteers (right) table to recruit new volunteers and build support for the Protect Our Oceans campaign, March 2026

CALPIRG Students

Students at UC Berkeley got coverage on local TV for Earth Day, 2025, after their event with city councilmembers and Senator Scott Wiener at the Aquarium of the Bay in San Francisco.

Students at UC Riverside (left) and UC Irvine (right) do education on campus. Spring 2025

CALPIRG Students

Lobby Day in Sacramento around strengthening ocean protections in Spring of 2025.

CALPIRG Students

Students host a press conference in Sacramento, February 2023, to deliver support for stronger and expanded marine protected areas in California.

CALPIRG at UC Davis hold an ocean species matching game and petitioning table for the Protect Our Oceans campaign (left). UC Riverside students (right) collect photo petitions for their campaigns. January, 2026

CALPIRG Students

UC Santa Barbara's "Carbs, Clay, and Coral" event at UC Santa Barbara. CALPIRG at UC Santa Barbara hosted a "Carbs Clay and Coral" event where volunteers built tiny coral reefs out of pasta, educated people about the campaign to expand Marine Protected Areas in California, and signed petitions. January 2026

Left: Students from UC Santa Cruz met with docents at Natural Bridges to talk about the Protect Our Oceans campaign. - Right: Students from CALPIRG's Protect Our Oceans campaign at UCLA and UC Riverside held a beach cleanup at the Santa Monica pier. They filled up a whole large trash can, and got beach goers to sign their petition!

CALPIRG Students

UCLA Students with Assemblymember Robert Garcia, February 2026

Left: Students meeting with staff from the office of Assemblymember Leticia Castillo. Right: UCLA Students meeting with with Assemblymember Ash Kalra. February 2026

CALPIRG Students

Students at UC San Diego (left) and UC Davis (right) launch their education drives to protect our oceans in February, 2026.

UC Santa Barbara (left) and UCLA (right) students collect support for their Protect Our Oceans campaign. Spring 2026

CALPIRG Students

Media Coverage on the campaign to Protect Our Oceans

UCSB Students rally for ocean protections

Photo by: KSBY

By: Sydney Morgan

Posted at 4:52 AM, Mar 01, 2023 and last updated 4:52 AM, Mar 01, 2023

UCSB Students are hosting a rally for ocean protections in preparation for their Sacramento Lobby Day.

https://www.ksby.com/news/ucsb-students-rally-for-ocean-protections

EAST BAY TIMES

Letters to the Editor | Letters: Flood solutions | Protect

Expand Marine ProtectedAreas for ocean health

California's oceans are severely under threat from practices we have known for a while are dangerous, like offshore oil drilling and overfishing. From the sea otters in kelp forests to the whales far into the Pacific Ocean, the species that make our coastline special are suffering. It is time to stand up for our oceans and stop dangerous activities so our ecosystems can bounce back, and ensure that the oceans we grew up with will remain for generations to come.

Marine Protected Areas have helped habitats thrive away from harmful human activities in California. It only makes sense to continue what is working, and increase California's Marine Protected Areas to 30% in order to protect the oceans we all love. California, with its iconic coast, can be a leader on ocean conservation and set the standard for the country and the world to follow.

Clara Castronovo*Piedmont*

https://www.eastbaytimes.com/2023/01/20/letters-1127/

CALPIRG Students

Culver City Observer

UCLA Students Host Ocean Carnival In Support Of Increased Ocean Protections

Mar 09, 2023 0

https://www.culvercityobserver.com/story/2023/03/09/news/ucla-students-host-ocean-carnival-in-support-of-increased-ocean-protections/12281.html

Santa Barbara Independent

Subscribe Got a Scoop?

Letters

Oceans Day

By **Hudson Truchard, S.B.**
Mon May 13, 2024 | 6:03am

Add independent.com on Google

As a kid, I was constantly at the beach, its vast ecosystems inspiring me to pursue a career in a STEM field. To this day I chase the wonder I felt looking at the mini ecosystems of tide pools, fascinated by the diverse life my two sisters and I found within them.

In order to do my part and push the Legislature to truly start gearing toward passing more climate conscious bills, I went to Sacramento CalPIRG to take part in Oceans Day, a massive coalition of environmental organizations all working toward one important goal: ensuring California's oceans and coastlines remain the important social and environmental asset they are. We hosted a press conference where various senators and assemblymembers spoke on the sheer importance of the bills they were championing, and their hopes to make strides toward a more equitable, environmentally sustainable future for California.

To ensure that future generations can be instilled with the same wonder I felt as a child, we need to push for the expansion and continued protection of our Marine Protected Areas to guarantee that we are not just idly waiting for the inevitable collapse of California's amazing coastline. MPAs are shown to be a critically important tool that we need to utilize if we want to protect the immense biodiversity and cultural significance of our coastline as they protect marine species from threats like overfishing, pollution, and habitat destruction.

https://www.independent.com/2024/05/13/oceans-day/

CALPIRG Students

THE GUARDIAN
UNIVERSITY OF CALIFORNIA, SAN DIEGO

UCSD CALPIRG Students Rally to Advocate for Marine Protected Areas

Melanie Khachatryan • Mar 5, 2023

https://ucsdguardian.org/2023/03/05/ucsd-calpirg-students-rally-to-advocate-for-marine-protected-areas/

'Save Our Oceans!' UC Santa Barbara Students Lobby to Maximize California's Marine Protected Areas

Ocean-Minded Activists Go to Sacramento Seeking to 'Protect Nature and Biodiversity for Generations'

By **Callie Fausey**
Mon Mar 06, 2023 | 3:21pm

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https://www.independent.com/2023/03/06/save-our-oceans-uc-santa-barbara-students-lobby-to-maximize-calif
o

CALPIRG Students

Santa Barbara Today

By the People, for the People

Senate Supports Expanded Marine Protections, MTP Petition Goal Met

UCSB student government backs plan to protect 30% of California's coastal waters by 2030, while mobility program secures ballot initiative.

Mar. 12, 2026 at 4:50pm

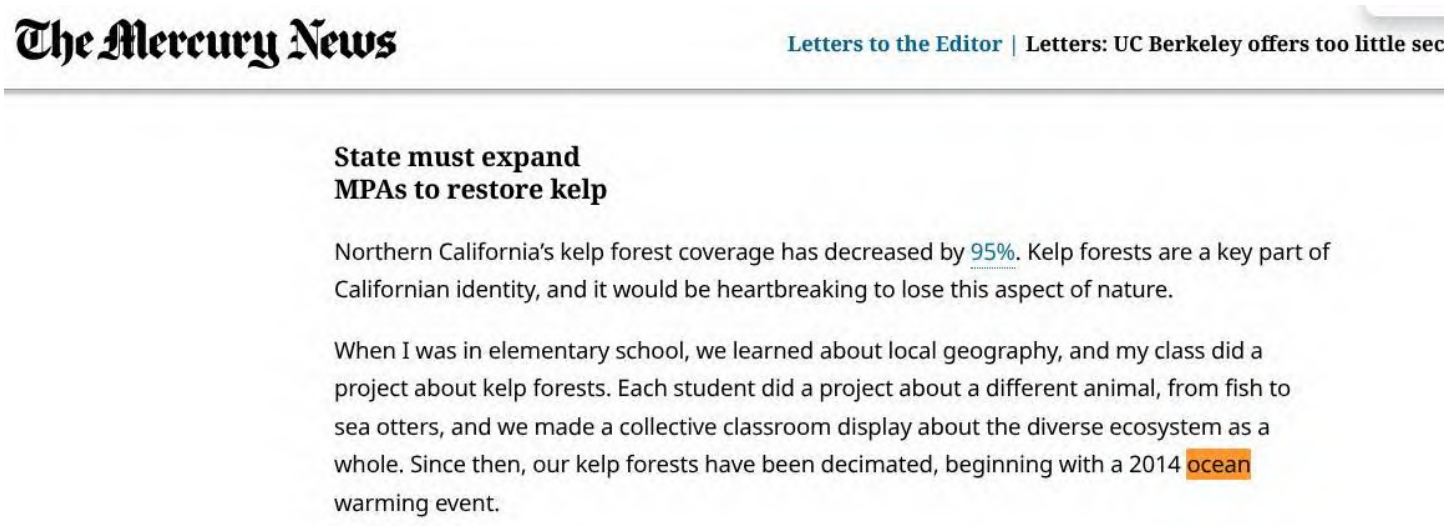
https://nationaltoday.com/us/ca/santa-barbara/news/2026/03/12/senate-supports-expanded-marine-protections-mtp-petition-goal-met/ *rnias-marine-protected-areas/*

enterprise

UCD students bring attention to oceans

Monica Stark, Enterprise staff writer Apr 25, 2025 Updated Apr 25, 2025 0

https://www.davisenterprise.com/news/ucd-students-bring-attention-to-oceans/article_615ebc3e-b87a-4b6e-83ea-7b8f17584859.html



The Mercury News

Letters to the Editor | Letters: UC Berkeley offers too little sec

State must expand MPAs to restore kelp

Northern California's kelp forest coverage has decreased by 95%. Kelp forests are a key part of Californian identity, and it would be heartbreaking to lose this aspect of nature.

When I was in elementary school, we learned about local geography, and my class did a project about kelp forests. Each student did a project about a different animal, from fish to sea otters, and we made a collective classroom display about the diverse ecosystem as a whole. Since then, our kelp forests have been decimated, beginning with a 2014 ocean warming event.

https://www.mercurynews.com/2025/11/14/letters-berkeley-security-conservative-event/

CALPIRG Students

Sunday, April 12, 2026

DAILY NEXUS

UNIVERSITY OF CALIFORNIA, SANTA BARBARA

STUDENT GOV

Senate supports expanded marine protections, MTP meets petition goal

March 12, 2026 at 9:50 am by Wynne Bendell and Olek Zurek

The 76th Associated Students Senate formally signed on to support expanded California marine protections at its last meeting of winter quarter on March 4. Later in the meeting, the Mobility Transportation Program announced it received enough petition signatures to get its fee initiative on the spring election ballot.

The Senate unanimously adopted a resolution expanding marine protected areas and fully protecting 30% of California's coastal waters by 2030. Shengyu Zheng / Daily Nexus

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https://dailynexus.com/2026-03-12/senate-supports-expanded-marine-protections-mtp-meets-petition-goal/

CALPIRG Students

‘Future Oceans,’ a look at San Diego County’s marine protected areas | San Diego Tribune

CALPIRG at UC San Diego and our friends at Environment California helped film a documentary last year with the San Diego Tribune. This week, it was finally released! The 35-minute film discusses threats to our oceans, and investigates San Diego County's 11 marine protected areas, along with proposals around expanding the existing Cabrillo Marine Reserve in San Diego. ***Watch the film on YouTube >>***

The segment featuring CALPIRG Students begins at the 14:40 timestamp

‘Future Oceans,’ a look at San Diego County’s marine protected areas

CALPIRG Students

Petitions In Support of Strengthening and Expanding Marine Protected Areas

Loca Crampin, UC Berkeley
Marleny Avila, UC Berkeley
Gabriela Rojasgarcia, UC Berkeley
Ronan Munoz, UC Berkeley
Ashley Nguyen, UC Berkeley
Yawei Zhang, UC Berkeley
Aysha Berry, UC Berkeley
Sofia Lopez Domingwez, UC Berkeley
Daniel Zlagan, UC Berkeley
Evalyn Flores, UC Berkeley
Dylan Hayes, UC Berkeley
Solange Deborah, UC Berkeley
Luiza Bacetti, UC Berkeley
Krish Bala, UC Berkeley
Howard Yao, UC Berkeley
Margarita Fedorova, UC Berkeley
Frederic Esters, UC Berkeley
John de Vere, UC Berkeley
Eliana Bazzo, UC Berkeley
Jinwoo Choi, UC Berkeley
Joy Tang, UC Berkeley
Sergio Gonzalez, UC Berkeley
Maya Ali, UC Berkeley
Mikayla Llamas, UC Berkeley
Pritesh Patel, UC Berkeley
Marco Green, UC Berkeley
Stacey Parra , UC Berkeley
James Bogursky, UC Berkeley
Delaney Marquette, UC Berkeley
Hope Tran, UC Berkeley
Paola Adame, UC Berkeley
Gargi Jejurikar, UC Berkeley
Emily Shu, UC Berkeley
Ashlyn Torres, UC Berkeley
Nicole Nguyen , UC Berkeley
Nicole Honguan, UC Berkeley
Karol Perez, UC Berkeley
Elizabeth Roeder, UC Berkeley
Ashlan Fortino, UC Berkeley
Greta Greco, UC Berkeley
Daisy Loya, UC Berkeley
Weijie Ma, UC Berkeley
Ryan Justice-Williams, UC Berkeley
Salvador Chavarria, UC Berkeley
Jenna Grant, UC Berkeley
Maisey Mansson, UC Berkeley
Alexis Hara, UC Berkeley
Mengyan Fang, UC Berkeley
Paulo Verzosa, UC Berkeley
Lia Lubit, UC Berkeley
Susan Wu, UC Berkeley
Hudson Dopp, UC Berkeley
Max Arellane, UC Berkeley
Daniel Kim, UC Berkeley
Hal Kikutani, UC Berkeley
Sheraz Shriqui, UC Berkeley
Conrad Tetrault, UC Berkeley
Willie Macharia, UC Berkeley
Diego Carranza, UC Berkeley
Sachin Rao, UC Berkeley
Haniya Irfan, UC Berkeley
Miriam Ramos, UC Berkeley
Shayan Premaratne, UC Berkeley
Denisse Ochoa Nguyen, UC Berkeley
Priyam Baruah, UC Berkeley
Luela Di Padova, UC Berkeley
Jorge Yorto Panduro, UC Berkeley
Sarah Chapman, UC Berkeley
Jennifer Rodriguee, UC Berkeley
Ethan Loth, UC Berkeley
Natalie Anaya, UC Berkeley
Kennedy Holloway, UC Berkeley
Victoria Phelps, UC Berkeley
Ariana Lara, UC Berkeley
Doreen Li, UC Berkeley
Lachian Cobb, UC Berkeley
Diego Rios, UC Berkeley
Giovanni Tlaxcalteco Lopex, UC Berkeley

CALPIRG Students

Axel Velasquez, UC Berkeley
Riley Weil, UC Berkeley
Lily Grodzins, UC Berkeley
Theodore Schimizzi, UC Berkeley
Emma Gallagher, UC Berkeley
Mia Chambers, UC Berkeley
Rossy Campos Moreno, UC Berkeley
Kennedie Edejer, UC Berkeley
Anabelle Kang, UC Berkeley
Shuheng Chen, UC Berkeley
Natsu , UC Berkeley
Ona Manen Gomez, UC Berkeley
Hudson Schuchmann, UC Berkeley
Ronnie Taylor, UC Berkeley
Lidia Michael, UC Berkeley
Kaylie Escobar-Islas, UC Berkeley
Allan Arata-Vega, UC Berkeley
Sandy Duong, UC Berkeley
Julia Goudey, UC Berkeley
Lucas Steele, UC Berkeley
Chris Calder, UC Berkeley
Michelle Croteau, UC Berkeley
Alexander Flores, UC Berkeley
Annie Foo, UC Berkeley
Rebekah Becerra, UC Berkeley
Fatina Peralta, UC Berkeley
Kyleigh Wallace, UC Berkeley
Vish Goel, UC Berkeley
Alexander Profatilou, UC Berkeley
Ethan Crouten, UC Berkeley
Elena Soad Yuja Matute, UC Berkeley
Sophia Parungao, UC Berkeley
Rui Oiny, UC Berkeley
Yong-lin Hu, UC Berkeley
Sofia Berman, UC Berkeley
Annabelle Monroe, UC Berkeley
Amina Raiss, UC Berkeley
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Rosa Sanchez, UC Davis
Ben Rosacker, UC Davis
Camili Leon, Berkeley
Alondra Torres, Berkeley
Michelle St, Berkeley
Natasha Thussu, Berkeley
Eu Suk, Berkeley
Daisy Paxtor, Berkeley
Biblan Santos, Berkeley

76th Senate

Winter Session

S.R. C-01

Resolution Type: Positional

A Resolution to Endorse Expanding Marine Protected Areas and Fully Protecting 30% of California's Coastal Waters by 2030 in Support of the CALPIRG Students Campaign

A resolution, brought by **Senator Eemaan Wahidullah** and joined by **Senator Erica Sherkin,** to formally endorse expanding Marine Protected Areas and supporting California's 30x30 conservation goals in partnership with CALPIRG Students and environmental stakeholders.

Endorsed by the following student sponsors:

WHEREAS: The student body within the University of California, Santa Barbara has an innate duty to a commitment to a thriving, healthy marine ecosystem, as the ocean acts not only as a learning lab for our many marine science programs, but as a classroom for early education through the REEF center, among others, and;

WHEREAS: Associated Students has the resources and skills to support ocean conservation efforts that are taking place at both the state level as well as through campus-based efforts, such as through BCU and RCOs, and;

WHEREAS: Marine ecosystems play a vital role in climate mitigation, as oceans absorb approximately 25–30% of human-generated carbon dioxide emissions, reducing atmospheric warming and stabilizing global climate systems; and,

WHEREAS: Marine Protected Areas (MPAs) are scientifically proven conservation tools that protect biodiversity, rebuild fish populations, increase ecosystem resilience, and sustain coastal economies dependent on marine resources; and,

WHEREAS: California's ocean economy supports over 563,000 jobs and generates approximately $42 billion annually through industries including tourism, recreation, and fisheries, demonstrating the ocean's critical economic importance to the state; and,

WHEREAS: California established its statewide Marine Protected Area network under the Marine Life Protection Act, creating one of the most comprehensive marine conservation networks in the world, protecting approximately 16% of state waters; and,

WHEREAS: The International Union for Conservation of Nature has placed California's Marine Protected Area network on the Green List, the global gold standard for effective conservation management; and

WHEREAS: The ocean is fundamental to life on Earth, producing over half of the oxygen we breathe, regulating climate systems, and serving as an iconic natural, cultural, and educational resource for students across California, particularly at UC Santa Barbara; and,

WHEREAS: Governor Gavin Newsom issued Executive Order N-82-20 committing California to conserve 30% of its coastal waters and land by 2030 ("30x30"), recognizing biodiversity conservation as essential to addressing climate change and ecosystem collapse; and,

WHEREAS: Expanding Marine Protected Areas contributes to increased fish populations, ecosystem restoration, and economic resilience for coastal communities dependent on sustainable fisheries; and,

WHEREAS: Santa Barbara County has experienced severe environmental harm from offshore oil drilling, including the 1969 Santa Barbara Oil Spill, which released approximately three million gallons of oil, catalyzing the modern environmental movement; and,

WHEREAS: More recently, the 2015 Refugio Oil Spill released over 140,000 gallons of crude oil along the Santa Barbara coastline, severely damaging marine ecosystems, killing wildlife, and impacting tourism, fisheries, and local economies; and,

WHEREAS: Marine Protected Areas help safeguard coastal ecosystems from industrial activities such as offshore drilling and overfishing, preventing long-term ecological and economic damage; and,

WHEREAS: CALPIRG Students is a statewide student advocacy organization that works to protect California's environment and mobilizes students to support expanding Marine Protected Areas and achieving California's 30x30 conservation goals; and,

WHEREAS: Students at the University of California, Santa Barbara have a strong vested interest in protecting local marine ecosystems, given UCSB's coastal location and institutional leadership in marine science research through programs such as the Bren School of Environmental Science and Management and Marine Science Institute;[1] and,

WHEREAS: Supporting Marine Protected Areas aligns with UCSB's institutional sustainability goals and the student government's responsibility to advocate for environmental protection, public health, and ecological resilience.

THEREFORE, BE IT RESOLVED by the Associated Students in the 76th Senate assembled hereby:

THEREFORE, LET IT BE FURTHER RESOLVED by the Associated Students in the 76th Senate assembled, The Associated Students of the University of California, Santa Barbara, formally endorses expanding Marine Protected Areas in California to fully protect 30% of the state's coastal waters by 2030 in alignment with Executive Order N-82-20 and CALPIRG Students' campaign goals.

THEREFORE, LET IT BE FURTHER RESOLVED by the Associated Students in the 76th Senate assembled, The Associated Students recognizes Marine Protected Areas as essential tools for protecting biodiversity, mitigating climate change, preserving local ecosystems, and safeguarding Santa Barbara's coastal environment.

THEREFORE, LET IT BE FURTHER RESOLVED by the Associated Students in the 76th Senate assembled, Associated Students supports the efforts of CALPIRG Students and will actively collaborate with CALPIRG Students and environmental partners by promoting conservation-related events, supporting student outreach and advocacy campaigns, and increasing campus engagement in Marine Protected Area and 30x30 initiatives

THEREFORE, LET IT BE FURTHER RESOLVED that the Associated Students supports science-based petitions that strengthen or expand Marine Protected Areas, and opposes petitions that would weaken existing protections, particularly those impacting ecologically significant regions near Santa Barbara and the Channel Islands.

THEREFORE, LET IT BE FURTHER RESOLVED that the Associated Students encourages campus departments, student organizations, and sustainability initiatives to incorporate ocean

conservation education, programming, and outreach into their activities where applicable.

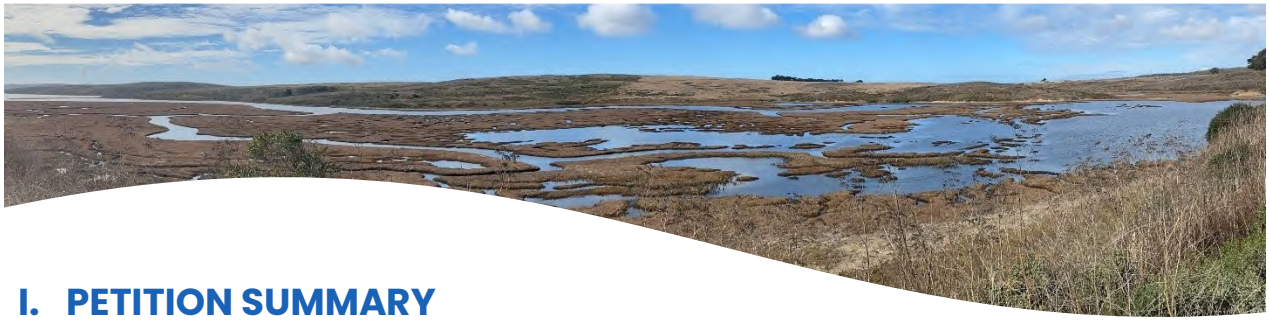
THEREFORE, LET IT BE FURTHER RESOLVED by the Associated Students in the 76th Senate assembled, that Associated Students calls upon the California Department of Fish and Wildlife, the California Fish and Game Commission, the California Natural Resources Agency, and the Ocean Protection Council to continue expanding, strengthening, and fully protecting Marine Protected Areas.

THEREFORE, LET IT BE FINALLY RESOLVED that copies of this resolution be transmitted to:

1. The Office of Governor Gavin Newsom
2. The California Natural Resources Agency
3. The California Department of Fish and Wildlife
4. The California Fish and Game Commission
5. The Ocean Protection Council
6. CALPIRG Students Statewide Leadership
7. UCSB Office of Sustainability
8. UCSB Marine Science Institute
9. UCSB Bren School of Environmental Science & Management
10. and the Associated Students Office of the President.

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

March 2026

II. CDFW RECOMMENDATIONS AND BRIEF JUSTIFICATION

Note: If a change to the Marine Protected Area (MPA) regulations is not needed to address the proposed change, California Department of Fish and Wildlife (CDFW) did not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-14MPA_1-9 Allow commercial urchin take at Sea Lion Cove, Stewarts Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's SMCAs.	The petitioner's stated intent for the proposed change is "The marine heat wave that started in 2014 led to large declines in kelp and urchin landings, resulting in federal fishery disaster declaration," and "allowing commercial urchin fishing within the listed SMCAs will improve the sustainability of the urchin industry and may also support kelp recovery efforts."	**Deny all petition actions.** The proposed change to allow commercial urchin harvest within nine SMCAs does not advance adaptive management recommendations from the Decadal Management Review nor address a current or emerging MPA management challenge. Further, the change would conflict with the original goals of these MPAs and potentially undermine the long-term MPA monitoring program. There is no evidence to support the proposed change would improve the sustainability of the urchin industry. Commercial urchin removal efforts are unlikely to result in meaningful and sustained kelp recovery without a clear understanding of the site-specific drivers of kelp loss. Statewide kelp restoration and management efforts should be guided by the Kelp Restoration and Management Plan (KRMP), which is in development.

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

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

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor? If yes, a. Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area? b. Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management).	No, this petition was not submitted by a tribe or representative designated by a tribe and does not have a tribal co-sponsor.

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

IV. PETITION EVALUATION

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-14MPA_1-9

The petitioner has requested to allow commercial urchin harvest within nine SMCAs including Sea Lion Cove, Stewarts Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's SMCAs, and Point Vicente No-take SMCA. The proposed change aims to address the petitioner's stated purpose to, "improve the sustainability of the urchin industry and [allowing commercial urchin harvest] may also support kelp recovery." Although the petitioner asserts the proposed actions align with one or more of the Master Plan objectives, CDFW's evaluation finds the proposal:

- Is inconsistent with the goals of these MPAs, as stated in the MLPA Initiative planning process,
- Does not align with the original intent of the MPAs,
- Would reduce protection levels for Double Cone Rock SMCA, Point Dume SMCA, and Point Vicente No-take SMCA and change the intended design of the 6 other SMCAs in a manner that would undermine the design of the MPA Network,
- Does not address a current or emerging MPA management challenge, and
- Would not advance management of the MPA Network.

The petitioner states that allowing commercial take of urchin in these SMCAs may benefit the urchin fishery and aid in kelp recovery. However, the petitioner did not provide information to support that these SMCAs are overgrazed by urchins. Urchins in heavily overgrazed areas are typically small, starved, and commercially non-viable, meaning urchin harvest from areas where kelp has been overgrazed would likely provide limited economic benefit to the fishery. Selective removal of large, marketable red urchins within barrens would minimally reduce urchin populations, resulting in little positive effect for kelp abundance. While urchin removal in controlled scientific studies has, in some cases, shown localized benefits to kelp recovery, restoration outcomes are highly variable and depend on multiple ecological and environmental factors (Eger 2022, Ward et al. 2022). Large-scale kelp declines, particularly in northern California, have been linked to marine heatwaves, ocean warming, and altered predator-prey dynamics, not solely to urchin abundance (Rogers-Bennett and Catton 2019).

The petition does not include any information on the status of kelp or urchin populations in the SMCAs, or other site-specific information to indicate restoration is needed in these SMCAs. Before pursuing restoration efforts, it is essential to identify whether a given habitat within a specific area needs restoration. It is also critical for kelp restoration efforts to implement intervention measures that address the site-specific ecological drivers of kelp loss. The petition does not make it clear if urchin barrens are a concern in

these SMCAs. It is also unclear the extent to which commercial urchin removal efforts applied widely across the requested SMCAs would result in measurable, biologically meaningful benefits to kelp beyond what the MPA Network currently offers.

In addition to CDFW's assessment that the proposed change would not benefit management of the MPA Network, CDFW is concerned the proposed change would introduce regulatory complexity and negatively impact the Network design and long-term monitoring data. The proposed change would reduce protection levels for Double Cone Rock SMCA, Point Dume SMCA, and Point Vicente No-take SMCA, resulting in these three MPAs no longer serving their designed connectivity role in the Network as MPA habitat replicates. This change would also increase the spacing between key habitats within the MPAs and result in a loss of replication of multiple key habitats among the MPAs. Although the change would not reduce the Level of Protection (LOP) for the six non-replicate MPAs, these changes would nevertheless change the intent of the MPAs and their designed role in the MPA Network. Additionally, all nine affected MPAs are part of California's long-term MPA Monitoring Program. Allowing commercial take would alter ecological conditions, introducing variability that would compromise the comparability and integrity of long-term monitoring data. Finally, several MPAs overlap with federally managed areas, including National Marine Sanctuaries, which would necessitate coordination with federal partners.

RECOMMENDATION FOR 2023-14MPA_1-9

Given these considerations, and the information in the evaluation below, **CDFW recommends the California Fish and Game Commission (CFGC) DENY the nine petition actions** proposing to allow commercial urchin harvest in the following SMCAs:

- **2023-14MPA_1**, Sea Lion Cove SMCA,
- **2023-14MPA_2**, Stewarts Point SMCA,
- **2023-14MPA_3**, Salt Point SMCA,
- **2023-14MPA_4**, Double Cone Rock SMCA,
- **2023-14MPA_5**, Naples SMCA,
- **2023-14MPA_6**, Anacapa Island SMCA,
- **2023-14MPA_7**, Point Dume SMCA,
- **2023-14MPA_8**, Point Vicente No-take SMCA, and
- **2023-14MPA_9**, Swami's SMCA.

EVALUATION QUESTIONS

2023-14MPA_1-9: Allow commercial take of sea urchin in nine SMCAs.

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?

No. 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 a whole. As such, CDFW has evaluated this action within the broader adaptive management framework and how the proposed action may or may not align with the MLPA Goals/Master Plan objectives and advance MPA Network management. See Question 1 of Attachment 1 for the MLPA Goals and Master Plan Objectives.

The proposed change would not align with one or more of the MLPA Goals or the MPA Master Plan adaptive management objectives and consequently, would not advance management of the MPA Network. The nine proposed affected SMCAs were designed to meet several MLPA Goals that are still relevant today, including:

- Sea Lion Cove SMCA was designed to meet MLPA Goals 2 and 3
- Stewarts Point SMCA, an MPA within the larger Stewarts Point State Marine Reserve (SMR), was intended to provide recreational take allowances for the Kashia Band of Pomo Indians, a federally recognized tribe in Sonoma County, and was designed to meet Goals 1, 2, 3, and 5 along with the SMR.
- Salt Point SMCA was designed to meet MLPA Goals 3 and 5.
- Double Cone Rock SMCA was designed to meet MLPA Goals 1, 2, 4, 5, and 6.
- Naples SMCA was designed to meet MLPA Goal 3, 4, 5, and 6.
- Anacapa Island SMCA was designed to meet MLPA Goals 1, 2, and 4.
- Point Dume SMCA functions as an MPA cluster with Point Dume SMR and the SMCA was designed to meet Goals 1, 2, 3, 4, 5, and 6.
- Point Vicente SMCA is currently No-take and functions as an MPA cluster with Abalone Cove SMCA, and was designed to meet Goals 1, 2, 3, 4, 5, and 6.
- Swami's SMCA was designed to meet MLPA Goals 1, 2, 3, 4, 5 and 6.

The proposal to allow commercial urchin take from these SMCAs would not support these MPAs in meeting or advancing any of the goals beyond which these MPAs already offer. Adding another take allowance for commercial urchin in these MPAs is not

consistent with MLPA Goals 1 or 2. Although the petitioner states that the urchin take may benefit kelp forests, there is not sufficient scientific evidence to verify commercial urchin take will have the desired effect of restoring kelp in these MPAs or that it is sustainable.

Regarding Goal 6, allowing commercial urchin harvest in Double Cone Rock SMCA would lower the LOP such that this MPA would no longer serve its connectivity objectives as intended in Goal 6. Point Dume SMCA functions as an MPA cluster with Point Dume SMR. Allowing commercial urchin harvest in the SMCA would lower the LOP such that this MPA cluster would no longer serve its connectivity objectives as intended in Goal 6. Point Vicente SMCA is currently No-take and functions as an MPA cluster with Abalone Cove SMCA. Allowing commercial urchin harvest in the SMCA would lower the LOP such that this MPA cluster would no longer serve its connectivity objectives as intended in Goal 6.

The petitioner asserts the proposed change to allow commercial urchin harvest in these nine MPAs is consistent with Regional Objectives 1.1, 1.5, 2.4, and 5.1 identified in Appendix C, D, E, and F of the 2016 Master Plan for Marine Protected Areas (CDFW 2016). However, meeting one or more of the regional objectives does not mean that the MPA with the proposed change would align with the MLPA Goals. In the broader adaptive management framework, the proposed change would not advance management of the MPA Network and in some cases, would compromise individual MPA design and MPA Network design.

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

No. The proposed change would not advance any of the adaptive management recommendations in the Decadal Management Review. See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

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

No. Although the petition states that the proposed change would address sustainability of the commercial urchin fishery and may contribute to kelp recovery, the proposed change does not address a current or emerging MPA management challenge. The proposed change would not benefit the long-term adaptive management of the statewide MPA Network without compromising the original intent of the affected MPAs and design of the Network.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

Yes. The proposed change interacts with California Code of Regulations (Cal. Code Regs.), title (tit.) 14, section 120.7, particularly subdivision (subd.) (a)(2). The petitioner states allowing commercial urchin harvest may benefit kelp recovery. However, it is unclear whether the petitioner intends to participate in these activities for the sole purpose of commercial urchin harvest, or if there is the intent to conduct research or restoration to improve the resiliency of kelp forests.

If the petitioner wishes to conduct commercial harvest of red urchin (*Mesocentrotus franciscanus*) as part of a research activity (i.e., kelp restoration research), Cal. Code Regs., tit. 14, section 120.7, subd. (a)(2) includes a provision that enables CDFW to issue an authorization letter to allow commercial harvest of red urchin (not purple urchin(*Strongylocentrotus purpuratus*)) within certain closed areas under specific conditions "to provide an economic incentive for cooperative sea urchin management and research activity." However, there is currently no regulatory pathway that would allow commercial harvest of purple urchin for research activities in MPAs, or commercial harvest of purple or red urchin for kelp restoration in MPAs.

CDFW has existing mechanisms to authorize research exploring the benefits of urchin removal to advance kelp recovery through issuance of Scientific Collecting Permits and is exploring the use of Restoration Management Permits to authorize kelp restoration; although, existing regulations do not allow commercial urchin harvest for kelp restoration in MPAs. Until statewide management plans for kelp recovery and restoration are in place (i.e., the KRMP-see response to Question 6), authorizing urchin harvest for kelp restoration research should continue at the research scale versus larger-scale commercial harvest.

Additionally, the proposed change is related to petitions CFGC previously considered and denied:

- 2013 petition to allow take of sea urchins in MPAs,
- 2020 petition to enact emergency regulations for increased recreational take of purple urchins in Monterey. CFGC adopted related regulations in December 2020, but did not approve recreational culling of urchins within MPAs, and
- 2021 petition to authorize culling of red and purple sea urchin within Monterey SMCAs.

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

Yes. Salt Point SMCA adjoins Salt Point State Park, but it is unclear whether the proposed change would have direct or indirect effects on the management activities of the Department of Parks and Recreation.

National Oceanic and Atmospheric Administration, National Marine Sanctuaries: Sea Lion Cove, Stewarts Point, and Salt Point SMCAs overlap with Greater Farallones National Marine Sanctuary. Anacapa Island SMCA overlaps with Channel Islands National Marine Sanctuary.

There are Areas of Special Biological Significance that overlap with Anacapa Island and Point Dume SMCAs, however, it is unclear whether the proposed change would have direct or indirect effects on the management activities of the State and Regional Water Quality Control Boards related to the Areas of Special Biological Significance.

There are tribal exemptions for Naples, Anacapa Island, and Point Dume SMCAs for the Santa Ynez Band of Chumash Indians that could be impacted by the proposed action.

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

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

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

- The status of the red urchin fishery,
- Existing science, regulations, and guidance pertaining to kelp recovery and restoration in California, and
- MLPA Planning documents and related information (e.g., MLPA Goals and MPA Master Plan adaptive management Objectives).

CDFW reviewed the available information and did not find that it supports the petitioner's assertion that, "allowing commercial urchin fishing within the listed SMCAs will improve the sustainability of the urchin industry and may also support kelp recovery efforts endorsed by [CFGC, CDFW], and the Ocean Protection Council." The petition did not

include evidence that these SMCAs need restoration or that the proposed change would support kelp recovery efforts in these SMCAs. Without direct evidence of a place-based need linking kelp declines to overgrazing by urchins, the proposed change is unlikely to result in measurable, biologically meaningful benefits to kelp beyond what the MPA Network currently offers. See Questions 1, 2, and 6 regarding the merits of this proposal related to advancing kelp recovery.

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

Yes. While urchin removal efforts specifically aimed at kelp recovery have, in some cases, shown localized benefits to kelp recovery, restoration outcomes are highly variable and depend on multiple ecological and environmental factors (Ward et al. 2022). Research in this area is ongoing and emerging. It is essential that kelp restoration and management is comprehensive and uses intervention strategies tailored to the specific drivers of kelp loss in a given area. CDFW has existing mechanisms to authorize research exploring the benefits of urchin removal to advance kelp recovery through issuance of Scientific Collecting Permits and is exploring the use of Restoration Management Permits to authorize kelp restoration; although, these regulations do not allow for commercial harvest. There is a need for clear, statewide guidance to inform the role of urchin take in kelp restoration and management.

CDFW, in partnership with the Ocean Protection Council, is developing a statewide, ecosystem-based, adaptive Kelp Restoration and Management Plan (KRMP) for giant kelp (*Macrocystis pyrifera*) and bull kelp (*Nereocystis luetkeana)*. The KRMP will include a cohesive kelp management strategy that consists of three core components:

1. An innovative framework for ecosystem-based management of kelp forests,
2. A harvest management framework and other Fishery Management Plan elements required by the Marine Life Management Act, and
3. A Restoration Toolkit.

Any potential adaptive MPA management measures intended to restore California's kelp beds must align with MLPA Goals and be informed by statewide restoration and management plans such as the KRMP. The Decadal Management Review Recommendation 18 highlights the need for CDFW to "Develop a framework to evaluate and approve appropriate restoration and mitigation actions within MPAs and marine managed areas." CDFW has not developed this framework yet, but it could include fishery practices that may support restoration within MPAs and Marine Managed Areas. A decision-making framework for permitting restoration activities in MPAs is also in

development and will work in conjunction with the KRMP to inform appropriate locations for restoration activities.

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

No. The proposed change (e.g., commercial take of urchin) was not considered for any of the nine listed MPAs during the MLPA Initiative planning process. All nine MPAs were intended to achieve significant protection, either individually or as part of an MPA cluster, and thus commercial take allowances were not considered except in a few very limited cases where the take would not decrease overall protection.

> **QUESTION 7B:** IS THERE NEW INFORMATION AVAILABLE, CHANGING CONDITIONS SINCE THE MLPA IMPLEMENTATION PHASE, AND/OR INFORMATION PRESENTED IN THE DMR THAT WARRANTS REEVALUATION OF THE PROPOSED CHANGE?
>
> **No.** There is no information that has emerged since implementation of the MPA Network to support allowing commercial take of urchin in these MPAs.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. Allowing commercial take of urchin does not align with the original intent of any of the nine MPAs.

During the South Coast MLPA Initiative planning process, the Blue-Ribbon Task Force recommended a High LOP for Swami's MPA (MLPA 2009). However, one of State Parks' primary purposes for this area during the MLPA Initiative planning process was to allow recreational hook-and-line fishing from shore. This concession was made, but it lowered the LOP from High to Moderate-low. Although commercial take of urchin would maintain the Moderate-low protection of Swami's SMCA, allowing commercial take of urchins does not align with the original intent of the MPA, and would further divert from the Blue-Ribbon Task Force's recommendation for a High LOP at Swami's.

Naples SMCA has a Low LOP due to the allowance of commercial take of giant kelp by mechanical and hand harvest, which was intended to offset the socioeconomic impact of the Campus Point SMCA (No-take) on an existing kelp lease. However, no additional commercial take was considered or intended for this SMCA.

Anacapa Island SMCA was intended to be a "limited take area" allowing for only recreational fishing for lobster and pelagic fish, and commercial fishing for lobster. Sea Lion Cove SMCA was designed "to provide protection for vulnerable intertidal habitat, abalone nursery and invertebrate communities" with "take of all invertebrates and marine aquatic plants prohibited." The Salt Point SMCA was designed to "enhance recreational experience via proximity to Stewarts Point and Gerstle Cove SMR" (MLPA 2008). Allowing commercial take of urchins does not align with the original intents of these MPAs.

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

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

Six of the MPAs affected by this petition do not currently meet the minimum criteria for replicates, due to their LOP (Anacapa SMCA, Stewarts Point SMCA, and Swami's SMCA) or both their size and LOP (Naples SMCA, Salt Point SMCA, and Sea Lion Cove SMCA). Given the proposal would not increase the size or LOP of these MPAs, it would not improve the design of these individual MPAs or the MPA Network, nor would it enhance alignment with the MLPA Science Guidelines.

Three of the MPAs affected by this petition (Double Cone Rock SMCA, Point Dume SMCA in a cluster with Point Dume SMR, and Point Vicente No-take SMCA in a cluster with Abalone Cove SMCA) currently serve their designed function as habitat replicates. The proposed change would lower the LOP of these three MPAs to Moderate-low, meaning they would no longer meet the minimum requirements to serve their designed connectivity role within the Network as habitat replicates. As a result, the proposed change would undermine the design of these individual MPAs and the overall MPA Network. See Question 9 of Attachment 1 for the MLPA Science Guidelines and additional context.

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

No. The proposed change would not align with the following Feasibility Guidelines: 'Take Regulations' guideline to "avoid allowing too many different uses." The change would add a different type and method of take (i.e., commercial take of urchin) to the MPA regulations for nine MPAs, which compromises enforceability of MPA regulations (see response to Question 11 regarding MPA regulation enforceability). See Question 10a of Attachment 1 for the CDFW Feasibility Guidelines.

QUESTION 10B: IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?

No. There is no alternative that would allow the commercial take of urchin in the nine MPAs while also meeting the CDFW Feasibility Guidelines.

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

No. The proposed change does not maintain or improve enforceability of these MPA regulations. The proposed change adds another type of take allowance (e.g., commercial take of urchin), which compromises enforceability of MPAs by:

- Making it more difficult to discern if an activity is allowed when surveilling the MPA from afar,
- Increasing the potential for non-compliance with members of the public who observe the activity taking place in an MPA but are unfamiliar with the regulations.

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

No. The proposed change would change the intent of the MPA and does not simplify the regulatory language or enhance public understanding.

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

No. The proposed change adds another take allowance that would decrease protection for urchins in all nine of the MPAs listed. This is of concern because red sea urchin populations have experienced lower abundance and diminished gonad size due to declines in its primary food source, kelp, particularly in northern California.

The proposed change would also lower the LOP for three of the nine MPAs and thus, no longer serve their designed connectivity role within the Network as habitat replicates (see response to Question 9 regarding the design of individual MPAs and the MPA Network using MLPA Science Guidelines).

As to maintaining or enhancing kelp protection, without direct evidence of a placed-based need linking kelp declines to the specific driver(s), it is not likely that the proposed change would result in measurable, biologically meaningful benefits to kelp beyond what the MPA Network currently offers.

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

See Question 14 of Attachment 1.

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

Yes. This change has the potential to affect consumptive and non-consumptive activities. Allowing commercial urchin harvest within the nine MPAs would provide a new take opportunity that is not currently authorized and has potential to affect commercial urchin diving activities.

Red urchin landings were most affected in northern California, where the fishery experienced severe declines following the 2014-2016 marine heat wave (Fig. 1). Opening small areas could offer some initial harvest opportunities for red urchin divers in the north. However, the long-term benefit to the fishery would be limited due to the relatively small habitat area within these MPAs compared to the overall fishing grounds.

South of Point Conception, the urchin fishery was less affected overall by environmental events. As a result, the potential benefits of the proposed changes in those MPAs are expected to be minimal in both the short and long term.

The proposed change also has the potential to negatively affect non-consumptive activities, such as long-term research and monitoring. For example, the Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO) conducts long-term monitoring of rocky reef habitat in each SMCA, except Sea Lion Cove SMCA. Adding another take allowance in these MPAs has the potential to introduce increased variability in the existing time series and would be detrimental to the long-term monitoring data.

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

See Question 16 of Attachment 1.

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

The following analysis was prepared by CFGC staff. See Question 17 of Attachment 1 for additional context on CFGC's response.

The proposed would increase fishing access, particularly for commercial urchin fishing participants and the associated coastal fishing communities of:

- **2023-14MPA_1.** Sea Lion Cove SMCA
  - Noyo Harbor/Fort Bragg (~25 nautical miles (nm) from area of proposed change)
- **2023-14MPA_2.** Stewarts Point SMCA
  - Bodega Bay (~14 nm)
- **2023-14MPA_3.** Salt Point SMCA
  - Bodega Bay (~12 nm)
- **2023-14MPA_4.** Double Cone Rock SMCA
  - Noyo Harbor/Fort Bragg (~25 nm)
- **2023-14MPA_5.** Naples SMCA
  - Santa Barbara (~8 nm)
- **2023-14MPA_6.** Anacapa Island SMCA
  - Ventura Harbor (~10 nm)
  - Channel Islands Harbor (Oxnard) (~11-13 nm)
  - Santa Barbara (~25 nm)
- **2023-14MPA_7.** Point Dume SMCA
  - Port of Los Angeles (San Pedro) (~25 nm)
- **2023-14MPA_8.** Point Vicente SMCA
  - Oceanside Harbor (~6 nm)
  - Dana Point Harbor (~18 nm)
  - Santa Barbara (~28 nm)
- **2023-14MPA_9.** Swami's SMCA
  - Oceanside Harbor (~7 nm)
  - Dana Point Harbor (~18 nm)
  - San Diego Bay (~22 nm)

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

Yes. This petition has the potential to interact with petition 2023-27MPA_AM at Anacapa Island SMCA, where the petitioner is proposing to prohibit or limit lobster take to protect eelgrass from damage associated with anchoring and bottom gear. Granting this petition may result in increased anchoring in Anacapa Island SMCA. Granting 2023-27MPA is not anticipated to affect this petition.

This petition also has the potential to interact with petition 2023-33MPA_AM, which is proposing a westward expansion of Point Dume SMCA as well as adding recreational take from shore by hook-and-line and spearfishing. Although the petitions are not in conflict with each other, both are proposing to increase take at Point Dume in different ways. Granting both petition actions would result in an allowance for recreational take from shore by hook-and-line and spearfishing *and* an allowance for commercial take of urchin. Adding take allowances has the potential to compromise enforceability and introduce increased variability in temporal trends at this location and would be detrimental to long-term monitoring data.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

TABLES AND FIGURES

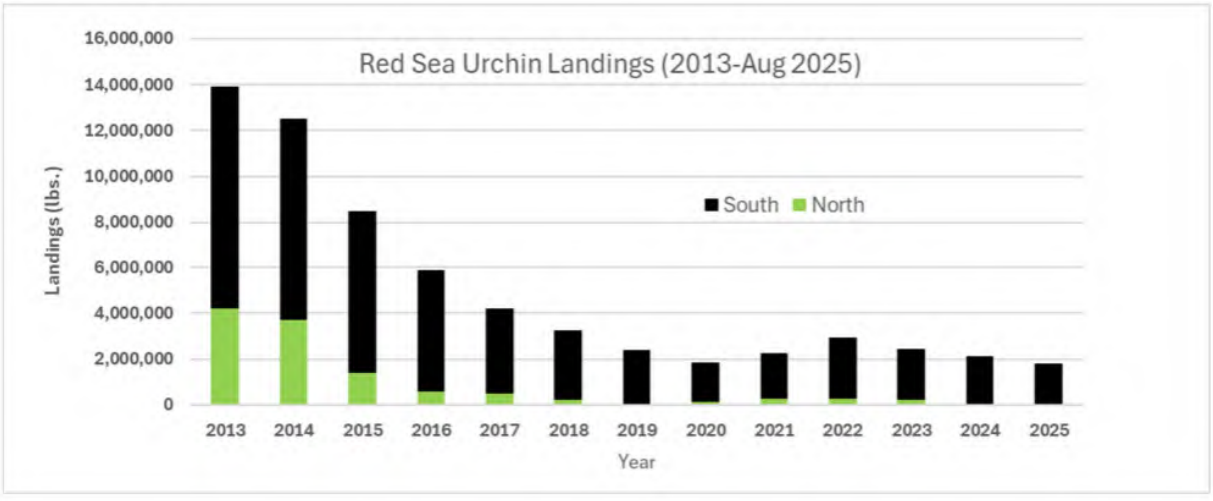


Figure 1. Statewide red sea urchin (*Mesocentrotus franciscanus*) annual landings (pounds of urchin) between 2013-2025. The north (green) and south (black) regions of the commercial fishery are demarcated by the Monterey and San Luis Obispo County line.

CITATIONS

California Department of Fish and Wildlife. 2016. California Marine Life Protection Act Master Plan for Marine Protected Areas. Adopted by the California Fish and Game Commission in August 2016.

Eger, A. M., *et al* (2022). Kelp restoration guidebook: Lessons learned from kelp projects around the world. The Nature Conservancy, Arlington, VA. 6b TNC-KFA-Kelp-Guidebook-2022.pdf

Marine Life Protection Act Initiative (MLPA). 2008. California MLPA North Central Coast Project Integrated Preferred Alternative Marine Protected Area (MPA) Proposal (adopted by the MLPA Blue Ribbon Task Force on April 23, 2008). Revised May 27, 2008.

Marine Life Protection Act Initiative (MLPA). 2009. California Marine Life Protection Act Initiative South Coast Project. Side-by-Side Comparison (maps and proposed regulations) of Revised SCRSG MPA Proposals 1, 2 and 3, and Proposal 0 (Existing MPAs).

Rogers-Bennett, L. and C.A. Catton. 2019. Marine heat wave and multiple stressors tip bull kelp forest to sea urchin barrens. Scientific Reports, 9.

Ward, M., McHugh, T. A., Elsmore, K., Esgro, M., Ray, J, Murphy-Cannella, M., Norton, I. and Freidwald, J. (2022) Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach. *Reef Check* Foundation, Marina del Rey, CA, April 2022, Restoration of Northern California Bull Kelp Forests - A Partnership-based Approach Reef Check Foundation

From: David Goldenberg <[redacted]>
Sent: Monday, April 20, 2026 05:21 PM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC <[redacted]>
Cc: David Goldenberg <[redacted]>
Subject: Comments Presented at the April 15, 2026 F&GC Bin 2 Discussion

Dear Melissa and Susan,

Attached are my comments that I tried to deliver during my 60 second public comment period on Wednesday, April 15, 2026 during the F&GC MPA Bin 2 agenda item. I only got about halfway through as I was trying to be polite with my introductory salutation.

I recall in years past that individuals who represented organizations, especially state agency organizations were provided an additional minute of time.

Thank you for agreeing to provide these comments to the Commissioners.

Sincerely,

David Goldenberg

Executive Director

California Sea Urchin Commission

David Goldenberg
Executive Director
California Sea Urchin Commission
Petitioner 2023-14 MPA

Public Comments for California Fish & Game Commission
Wednesday, April 15, 2026
MPA Bin 2 Discussion

- The members of the California Sea Urchin Commission were disappointed that petition 2023-14MPA sponsored by the California Sea Urchin Commission failed to meet the standards of the Master Plan guidelines; we support the Department's findings to reject all the petitions evaluated.
- There was very little guidance for this process, and our expectation was that this process would only be technical changes, and any changes to our MPA network would be developed with regional community working groups and adhere to the standards established in the MLPA Master Plan adopted by this Commission under the authority granted to it by the Legislature as the sole authority to establish and modify marine protected areas.
- We expect the Commission will abide by the Master Plan guidance, recognized internationally as the gold standard for the stewardship of our marine protected areas.
- The core concept of our petition (2023-14MPA) is to allow the commercial urchin fishery to remove overpopulated urchins in selected MPAs in order to facilitate kelp restoration. We stand ready to work with the Commission and the Department to facilitate a well reasoned plan that can be incorporated into the Kelp Restoration Management Plan, which is essential to guiding recovery and management of our critical kelp resources.
- To be clear, we do not support any changes to the MPA network that do not meet the standards and guidelines established in the MLPA Master Plan.
- We are pleased the tribes are considering co-management of MPAs, but we are concerned that the petitions referred to the Tribal Committee have not yet been evaluated under the same standards as the non-tribal petitions. It is our expectation that they ultimately will be.
- In response to the Ocean Protection Council's letter to the FGC dated March 20, 2026, we look forward to the empirical analysis of how the OPC proposes to help California fisheries by increasing the no-take MPA footprint. The urchin fishery has not observed any benefits resulting from no-take MPAs—in fact, it has been our observation that many of the MPAs are being negatively impacted by urchin barrens. It was these impacts that prompted the California Sea Urchin Commission to propose its MPA petition to mitigate these impacts.
- We respectfully encourage the Commission to reconsider its Decadal Review process so that it follows the promises it made to the stakeholders when the Master Plan was created.

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: **Support for Petition 2023-14MPA – Commercial Sea Urchin Harvest in SMCAs Including Anacapa Island**

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 am writing to express our strong support for Petition 2023-14MPA, which proposes allowing the commercial take of sea urchins in selected State Marine Conservation Areas, including Anacapa Island SMCA.

This petition represents a thoughtful and forward-looking example of **adaptive management**, addressing both ecological challenges and the urgent socioeconomic needs of California's commercial fishing communities.

The petition clearly identifies the dramatic decline in the sea urchin fishery, including a collapse in landings from over 4 million pounds to less than 300,000 pounds, resulting in a federal fishery disaster declaration.
This decline has had **direct and significant economic impacts** on fishermen, processors, and coastal communities that rely on this fishery.

At the same time, the petition highlights a critical ecological issue—**urchin barrens and the loss of kelp forests**—and proposes a solution that aligns economic recovery with ecosystem restoration.

This is particularly relevant to **Anacapa Island**, where:

- Kelp ecosystems are a foundational component of marine productivity
- Urchin overpopulation can suppress kelp recovery
- Managed urchin harvest can act as a **restorative tool**, reducing grazing pressure and supporting kelp regrowth

By allowing commercial divers to harvest urchins in Anacapa SMCA, this petition creates a **win-win scenario**:

- **Ecological benefit** through kelp forest recovery
- **Economic benefit** through revitalization of the urchin fishery
- **Local job support** for fishermen, processors, and supply chains
- **Increased coastal economic activity** tied to a recovering fishery

Importantly, the petition also notes that there are **no known negative economic impacts**, and in fact anticipates positive economic benefits from reopening access to these areas.

From a socioeconomic perspective, this petition stands out because it does not displace effort or compress fishing activity into smaller areas. Instead, it **expands opportunity**, reduces pressure on existing open grounds, and distributes fishing effort more efficiently across the region.

This approach directly addresses one of the most significant gaps identified in other MPA petitions—the failure to consider how fisheries operate as interconnected systems.

Petition 2023-14MPA does exactly that.

It recognizes that commercial fishermen can play a **constructive role in ecosystem management**, particularly in addressing imbalances such as urchin overpopulation.

For Ventura and Santa Barbara-based fleets, including those operating around Anacapa Island, this petition offers a pathway to:

- Restore access in a controlled and beneficial manner
- Improve economic stability for working fishermen
- Contribute directly to ecosystem health through targeted harvest

For these reasons, VCCFA strongly supports Petition 2023-14MPA and encourages the Commission to move forward with its consideration as a model for adaptive, science-based, and economically informed MPA management.

Thank you for your time and continued leadership.

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

State of California – Fish and Game Commission
PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATION CHANGE

Petition2025-15MPA Amendment Cover Message

The revisions to this petition involve two sets of informational changes: amendments to the original petition actions and additional stakeholder feedback/rationale that has been gathered over the last year.

Petition actions being revised:

- Modification of options 3 and 4 in the original petition to align with federal feedback and existing regulations in Groundfish Exclusion Areas (GEAs). Rather than only allowing “surface-fishing-methods” the options now restrict “bottom-contact-gears,” like the GEAs. This change was made so that entirely new language and definitions do not need to be drafted in a case options 3 or 4 are selected. (Located on page 3, 11, and 18)

- Addition of a 5th and 6th option consisting of only non-hook-and-line gear methods for consideration, this is not an additional action, just a different combination of allowable methods from the original petition. The new options 5 and 6 would only allow recreational spearfishing of pelagic finfish (option 5) or highly migratory species (option 6) and would allow the commercial take of swordfish by harpoon (options 5 and 6). These options were added to be the least invasive as possible in terms of take, be possibly easier to enforce than the other hook-and-line options and would solve the commercial swordfish gear drift problems for harpoon gears (but not for DSBG). (Located on page 3 and 18)

- Modification of the optional nearshore/offshore MPA boarder at the Santa Barbara Island MPA to a straight line between two points of latitude and longitude versus the original boarder being the 1 nautical mile line from the island. The reason for this change is to align to the MPA design criteria set in the MLPA which states to not use odd shapes or curves, only straight lines between tenth or whole minute latitudes and longitudes. (Located on page 3, 19, and 20)

- Modification of how deep-set-buoy-gear (DSBG) will be considered in the petition. Currently DSBG is only a federal fishery and still in its EFP stage at the State level, consideration of its allowance inside the state waters of MPAs will remain pending with the FGC and CDFW until DSBG is a state fishery. Until then, only a federal process may allow DSBG in the federal portions of the MPAs. Therefore, DSBG has been isolated from all of the options, now having its own action section due to the unique case of that process. (Located on page 4, 16, and 17)

Additional stakeholder feedback/rationale being added:

- Commercial swordfish gear(s) uncontrollable movement into primarily these MPAs, per MDFE effort data, poses problems that must be resolved. (Located on pages 11-13)

- Naval closures local to the Channel Islands restricting most offshore fishing opportunity except near two of the petition MPAs. (Located on page 13)

- Additional information pertaining to adaptive management, the MPA Master Plans (2008 and 2016), the MLPA, and climate resiliency in the scope of this specific petition. (Located on pages 14-15)

Tracking Number: (_2023-15MPA_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: Blake Hermann
   Address:
   Telephone number:
   Email address:

2. **Rulemaking Authority (Required) -** Reference to the statutory or constitutional authority of the Commission to take the action requested:
   -Fish and Game Code (FGC) Division 1, Chapter 2, Sections 200, 205c, 265, and 399
   -Fish and Game Code (FGC) Division 2, Chapter 5, Sections 1590 and 1591
   -Fish and Game Code (FGC) Division 3, Chapter 10.5, Sections 2860 and 2861
   -Fish and Game Code (FGC) Division 6, Chapter 6, Section 6750
   -Public Resource Code (PRC) Division 27, Chapter 7, Sections 36725(a) and 36725(e)

3. **Overview (Required) -** Summarize the proposed changes to regulations:

This petition requests a modification to three Marine Protected Areas (MPAs) off Southern Santa Cruz Island and Santa Barbara Island, known as the Footprint Marine Reserve (The Footprint), Gull Island Marine Reserve (Gull Island), and The Santa Barbara Island Marine Reserve (SBI). The Footprint and Gull Island Reserves are located on the southeast and southwest sides of Santa Cruz Island respectively, and the SBI Reserve is located on the south-east corner of Santa Barbara Island.

This petition requests, for the reasons stated in the accompanying sections, that The Footprint, Gull Island, and SBI Reserves be modified and partially opened and converted into limited take conservation areas with implementation of one the following options (listed from the most to least allowances):

Option 1: The least restrictive option, with some existing precedent SCMAs (2nd preferred option):
- The recreational take of pelagic finfish* by hook-and-line and spear is allowed.
- The commercial take of pelagic finfish* by hook-and-line, and swordfish by harpoon is allowed.
- ~~Deep-Set-Buoy-Gear (DSBG) is allowed in the federal portions of the proposed MPAs. **~~

Option 2: Elevated protections in species selectivity (1st preferred option):
- The recreational take of Highly Migratory Species (HMS)* by hook-and-line and spear is allowed.
- The commercial take of Highly Migratory Species (HMS)* by hook-and-line, and swordfish by harpoon is allowed.
- The possession of Coastal Pelagic Species (CPS) is allowed.
- ~~Deep-Set-Buoy-Gear (DSBG) is allowed in the federal portions of the proposed MPAs. **~~

~~Option 3: Option 1 with only allowance of "surface fishing methods:" ***~~
- ~~The recreational take of pelagic finfish* is allowed via surface fishing methods.~~
- ~~The commercial take of pelagic finfish* by hook-and-line via surface fishing methods, and swordfish by harpoon are allowed.~~

~~Option 4: Option 2 with only allowance of "surface fishing methods:"~~
- ~~The recreational take of Highly Migratory Species (HMS)* is allowed via surface fishing methods.~~
- ~~The commercial take of Highly Migratory Species (HMS)* by hook-and-line via surface fishing methods, and swordfish by harpoon are allowed.~~
- ~~The possession of Coastal Pelagic Species (CPS) is allowed.~~

Option 3: Same as option 1 with restriction of "bottom-contact-gears." (4th preferred option)
- The recreational take of pelagic finfish is allowed by hook-and-line and spear, except through the use of bottom-contact-hook-and-line and bottom contact gears, which is restricted.
- The commercial take of pelagic finfish by hook-and-line is allowed, except through the use of bottom-contact-hook-and-line and bottom contact gears, which is restricted.
- The commercial take of swordfish by harpoon is allowed.

Option 4: Same as option 2 with restriction of "bottom-contact-gears." (3rd preferred option)
- The recreational take of highly migratory species is allowed by hook-and-line and spear, except through the use of bottom contact hook-and-line and bottom contact gears, which is restricted.
- The commercial take of highly migratory species by hook-and-line is allowed, except through the use of bottom-contact-hook-and-line and bottom contact gears, which is restricted.
- The commercial take of swordfish by harpoon is allowed.
- The possession of coastal pelagic species is allowed.

Option 5: non-hook-and-line of pelagic finfish (6th preferred option):
- The recreational take of pelagic finfish by spear is allowed.
- The commercial take of swordfish by harpoon is allowed.

Option 6: non-hook-and-line of highly migratory species (5th preferred option):
- The recreational take of highly migratory special by spear is allowed.

- The commercial take of swordfish by harpoon is allowed.

Deep-Set-Buoy-Gear (DSBG):
DSBG, currently being a federal exclusive fishery, would need to be considered inside of these areas through a federal stakeholder process and would ultimately only allow DSBG in the federal water portions of these MPAs. Analysis of allowing DSBG inside of the state water portions of these MPAs will remain pending with the FGC and CDFW until it passes the EFP stage, becoming an official state gear type, and if one of the above options is grated entirely or in-part.

Each of the above options **may** also include a reduced in size, more selective, limited-take or no-take zone within the Gull Island and SBI zones. However, as discussed later, these areas are only needed if Options 1 or 3 are selected (See Attached: Full Analysis Document 1).

*List of State HMS, *CPS, and Pelagic finfish* per Title 14 CA § 1.49, *1.39, and 632(3)*:
-Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius).
-Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens).
-Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

~~**Deep-Set-Buoy-Gear (DSBG), if allowed, would **only** be allowed beyond the 3nm line, outside of state waters, as is currently fished. Barring any future changes or exempted fishing permits (EFPs).~~

***See Full Analysis Document attachment (Document 1) for detailed description.

4. **Rationale (Required) -** Describe the problem and the reason(s) for the proposed change:

The Problem:

Initially established in 2003 and federally expanded in 2006, the Channel Islands MPA network containing The Footprint, Gull Island, and SBI Reserves was the first network of its kind in California history. This island network later expanded into the statewide MPA network during coastal implementation phases from 2007-2012. The problem created by these first MPAs was the unintentional protection of seasonal pelagic and highly migratory species that migrate into Southern California during the summer months.

The allowance of limited pelagic or highly migratory take in these areas falls in line with the adaptive management measures set forth in the Decadal Management Review (DMR) and reinforced by the Marine Resource Council's (MRC) near-term recommendations. The proposed changes also fall in line with the MPA Master Plan and align with FGC comments on previous change request petitions.

While maintaining the original intentions for the creation of the MPAs, the proposed changes will have minimal impacts on the ecosystem due to the selective nature of the gear being recommended and highly mobile species it would allow for.

Summary of the reasons for change:
This petition aims to prove this proposal is justified by showing the following*:

- Limited take of pelagic finfish or HMS does not significantly affect or interfere with the species and features the MPAs aim to protect
- The proposed changes provide better equality of MPA policy across the state
- The 20 years of data from these and other MPAs support the proposed changes
- The proposed changes are in line with MPA decadal management review (DMR) comprehensive recommendations and the near-term priority recommendations of the marine resource committee (MRC)
- The proposed changes follow precedent set by the FGC's comments on previously submitted petitions, the current MPA overviews, the 2016 MPA master plan for the southern section, and the original 2002 MPA CEQA for the Channel Islands Network
- The proposed changes exclusively allow for sustainable fishing methods on no at risk populations/species
- The proposed changes support sustainable commercial fisheries the state and NOAA have expressed desire to further expand
- The proposed changes are reasonably enforceable (per discussions with F&G officers)
- The proposed changes have mass public support from the public, fishery groups, non-fishery groups, and conservation organizations

If implemented the resulting changes may have the following effects:

- The Channel Islands MPA network would be updated to allow for a more equitable 60/40 no-take to limited take closure ratio, which would be in line with the state's ratio
- Would provide new fishing opportunities to sustainable recreational and commercial fisheries while producing minimal impacts to the intended protected structures and species
- Provide new research opportunities for observing previous no-take zones under new allowance of pelagic or HMS limited-take
- Help grow local business and further develop the local and state economy

*Further detailed explanations, analysis, and figures are included in Document 1, and the remaining documentation in the "Supporting Documentation" section.

SECTION II: Optional Information

5. **Date of Petition:** Submitted-11/22/2023

6. **Category of Proposed Change**
   - ☒ Sport Fishing
   - ☒ Commercial Fishing
   - ☐ Hunting

☐ Other, please specify: Click here to enter text.

7. **The proposal is to:** (*To determine section number(s), see current year regulation booklet or https://govt.westlaw.com/calregs*)
   ☒ Amend Title 14 Section(s): Division 1, Subdivision 2, Chapter 11, § 632
   ☐ Add New Title 14 Section(s):.
   ☐ Repeal Title 14 Section(s):
   *See Document 20 for State and Federal Code modifications example

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: Due to the change regarding modifying existing MPAs that cover both State and Federal waters, the federal bodies (NOAA, NMS, and PFMC) must mirror the above changes in their portions of the MPAs to allow for reasonable enforcement of these areas. Due to the lack of precedent, this being the first time the FGC is allowing petitions for individual or groups of MPAs to be modified, new channels need to be opened in order to facilitate such changes. A reasonable amount of time for all parties (state, federal, and public) to review and confirm the reasonings and data provided is required. This petition simply requests this change be made as soon as is practical.

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

Document 1: Complete, in-depth analysis of the prescribed changes and key points including weighing out the aforementioned change options, scientific basis, and stock assessment analysis.

Why Change These MPAs?

California's MPA network has provided valuable data for researchers allowing for observations of small-scale ecosystems in their raw form with no human intervention. That being said, all research focuses on the local non-pelagic species in these areas. The reasonings for this will be discussed later in depth but is a result of the massive area pelagic populations cover making their net presence the same everywhere. It is for this reason that if changes are made, the local non-pelagic species will remain unaffected, and still be protected under the proposed changes.

This petition aims to prove that specific limited-take allowances will not significantly interfere with the populations the MPAs aim to protect. This petition requests 3 current MPAs be modified to limited take in order to allow for sufficient numbers of no-take zones to still remain in the Channel Islands Network for research and public non-consumptive use (approximately 60% of the island network will remain no-take zones).

With the proposed change, there lies immense research opportunity in filling gaps in our knowledge. Never has a no-take MPA been converted into a limited-take zone. If there are factors that limited-take of pelagic or HMS does have on the local, non-pelagic populations (currently none are known), this change would allow for a whole new branch of research to take place; observing converted no-take zones after 20 years of historical data.

This petition acknowledges the need for no-take MPAs around the Channel Islands to act as a baseline to research as well as areas for the public to view undisturbed waters, and if implemented approximately 60% of the island network would remain no-take. This would mirror the state average for no-take zones. This petition also acknowledges there is no reason to request for a limited take zone in an area far offshore or often locked by foul weather that would theoretically only be fished a handful of times a year. These areas were selected for the reason that they offer sufficient new opportunities to the fishing community and researchers if the no-take areas are converted into limited-take areas.

A unique fact of these three MPAs, and other MPAs in the Channel Islands network is their expansion beyond state waters, something we see nowhere else in the state. All three of these MPAs are part of this subset of state/federal MPAs, extending 6nm from the islands compared to the traditional 3nm a normal MPA would cover. This means for this specific petition, if changes are made, both State and Federal changes should be mirrored to allow for reasonable enforcement and streamlining of regulations. The Commission and CDFW would likely need to partner with NOAA and the Channel Islands National Marine Sanctuary (CINMS) to make these dual zone changes within each MPA. Therefore, this petition will also be addressing NOAA/CINMS and federal fisheries in addition to the Commission and state, so all agencies are aware of the changes being requested and the supporting factors for this change.

The First California MPAs:

The Channel Islands MPA network was the first set of MPAs in California history. Established in 2003, the state closures were expanded in 2006 into federal waters, completing the Channel Islands MPA network. The first state MPAs off the central coast were then implemented one year later, in 2007, beginning the statewide network. The Channel Islands MPAs had no accompanying southern section coastal MPAs until the southern section's implementation in 2012, which also marked the completion year of the state MPA network and nearly a decade of existence for the Channel Islands MPAs.

Being the first, the Channel Islands Network acted as a baseline, moving the state into previously unexplored territory, that today has grown into the current network. That being said, these first MPA implementations were not perfect. We have learned a lot since their creation, from better understandings of both non-pelagic and pelagic species to new closures ideas that followed in the four coastal MPA regions. Now that we have had more than 20 years to observe how this island network acts, it is time to make fine-tuned adjustments in order to modernize the Channel Island network to better mirror the remaining state network and the latest research.

MPA Intentions - Focus on Local Non-Pelagic Species:

Being the first set of MPAs and covering both state and federal waters, the state partnered with the Channel Islands National Marine Sanctuary (CINMS) and NOAA to develop a plan in order to determine how the Channel Islands MPA network would look. In the end, a two-part CEQA was developed that laid out the MPA plan for the Channel Islands network, in which the broad and specific reasonings for The Footprint, Gull Island, and SBI reserves were discussed *(Docs. 3-5).*

Broadly speaking all three of these Channel Islands MPAs were put into effect either around common invertebrate/fishing grounds or were built off of an existing invertebrate closure (SBI). The CEQA acknowledges that placing MPAs around these zones may have congested fishing efforts elsewhere and may slow fisheries short-term. However long-term, it was the belief that these protected areas would act as a sort of oasis, growing mass populations inside that would expand out as they grow to capacity inside reserves. These populations would then radiate from these areas and would in turn help fisheries over time.

We can see the idea of protecting the local, nearshore species of the Channel Islands very evident in each of the three MPA justifications in the CEQA *(Docs. 3-5)*, the 2016 MPA master plan goals *(Doc. 10)*, and the published MPA overviews *(Docs. 7-9)*.

According to the CEQA, The Footprint was originally established with the primary intention to protect the unique rocky reefs and rebuild the rockfish populations *(Doc. 7)*, The CEQA discussed the depleted groundfish stocks at the time and mentioned how they would benefit the most from the MPA's implementation. The Gull Island and SBI reserves also discuss deep water reefs and rockfish, but focus more on endangered bird nesting grounds, abalone populations, and the more diverse, nearshore species along the islands they border *(Docs. 8 and 9)*. The broad implication of the MPAs in the CEQA was the intention that local populations of fish, birds, and mammals inside the MPAs would, "respond to protection within the reserve through increased density, individual size, and reproductive potential," *(Docs. 3 and 4)*.

This logic is something we see echoed today in the modern MPA overviews of the three MPAs and the goals of the MPA Master Plan *(Doc. 10)*. In the MPA overviews under, "Why was this location chosen for a state marine reserve?" we still see reasons such as the protection of canyons, rocky reefs, pinnacles, kelp forests, and rocky nearshore habitats for local non-pelagic species including copper rockfish, sheepshead, cowcod, and bocaccio. However, there is zero mention of any pelagic or HMS in these overviews. This point is further reinforced by the southern section MPA master plan, where under its goals, states its intentions revolve around protecting the ecosystems within the MPAs and help rebuild rare or depleted populations of species that are, "more likely to benefit from MPAs," and, "Protect selected species and the habitats on which they depend while allowing some commercial and/or recreational harvest of migratory, highly mobile, or other species; and other activities," *(Doc. 10)*. All of these protective goals are catered to the local species of non-pelagic fish, while the pelagic goals clearly state that pelagic and HMS should have limited take areas, something that the Channel Island network severely lacks compared to the rest of the state.

Proposed Changes Effect on the Original MPA Intentions:

As mentioned, the original and current goals of these three MPAs revolve around protecting the local, non-pelagic, and nearshore species within them. The idea of a radiating effect helping fisheries around MPAs does indeed hold merit for local populations of non-pelagic species. Species like groundfish that could in theory live, feed, and spawn all within one MPA are a prime example of this working as intended today. A groundfish that may have lived its entire lifecycle inside of a protected area, will only affect that local protected area if that individual was taken. This is why if implemented, the changes would still protect all invertebrates and non-pelagic species, such as rockfish, leaving the original science backed protections, and MPA intentions, in effect.

In regard to these intentions for pelagic or HMS, limited pelagic or HMS take would not noticeably affect any of the pelagic or HMS populations within our waters. This is the case since pelagic and HMS are either highly mobile or seasonal migrators, moving with currents rather than remaining on structure or in a small MPA zone. It is one thing if an entire or significant population of a species live inside a protected area, but for species that live and move over a vast area, these MPAs are negligible in helping their population. Species that live and feed over massive areas of ocean, and spawn hundreds of miles away from the network are intrinsically less affected by a small area they may or may not pass through each year. Unlike the non-pelagic species covered in the CEQA, Master Plan, and modern overviews, pelagic species' population densities, individual sizes, and reproductive potentials are not meaningfully affected by these MPAs. Populations would essentially remain as affected by human impacts whether this proposal goes into effect or not due to the protected areas covering so little of the area they live in. This is something that was actually touched on in the CEQA, where it is stated, "No-take areas, so long as their size is large relative to the

movement of the species, will lead to increased (species) abundance," *(Doc. 6)*. Essentially, due to pelagics and HMS covering so much area throughout their travels, the impact on a pelagic or highly migratory species being protected inside the existing MPAs is near zero. Therefore, there is no scientific basis to leave protections for these species in effect within these three MPAs.

A prime example is the swordfish, one of the three primary species that would be reasonably targeted inside the MPAs if partially opened. Satellite tag data from the Pfleger Institute of Environmental Research (PIER) *(Doc. 15)* shows tagged swordfish off southern California traveling from the tag location to as far south as Cabo (900 nm), or nearly as far west as Hawaii (1900 nm) to spawn in the winter/spring. They then migrate back to Southern California one year later in the summer to feed. Like the swordfish, other HMS such as marlin or tuna are also examples of species that travel massive distances every year during their migrations. These species cover so much water that the net environmental impact from small areas like these MPAs is near zero. It is for this reason the petition requests that pelagic or highly migratory species are able to be targeted inside of these three areas.

Following MPA Reports, The Need for Adaptive Management:
In January 2023 the DMR of the State's MPA network was published and contained comprehensive recommendations including the following considerations:

- "Allow take of migratory and pelagic species in MPAs that currently do not allow it" and
- "Return MPA fishing opportunities, especially in legacy fishing areas that were previously open to fishing." (*Doc. 12*)

The Footprint, Gull Island, and SBI Reserves fall under legacy pelagic fishing areas, being once completely open. In alignment with the DMR, these legacy areas can be justifiably re-opened to the limited take of pelagic or HMS per the recommendations.

This change is also supported by the recommendation of the Marine Resource Committee (MRC), as outlined in the networks near-term priorities from the DMR. Stating we must, "Apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network and Management Program." We have had ample time to observe these MPAs over their two-decade existence, now that we better understand the low impacts pelagic and HMS have on the network, we can justifiably adaptively manage these MPAs, opening them to limited take. In addition to the DMR and MRC recommendations the 2016 MPA master plan directly called for limited take areas of pelagic or HMS. Due to these three MPAs being the among the oldest modern MPAs, existing since 2003, it is possible the Master Plan considerations from 2016 were not as refined in 2003. This is something we can now remedy, by modifying these MPAs to modern network outlooks.

In addition to adaptive management measures there also exists a pre-DMR precedent from the FGC stating that the MPA network is not designed for pelagic or HMS. In 2020 the FGC denied a petition calling for creating a sanctuary/MPA for Great White Sharks near Carpentaria on the grounds that MPAs are intended, "[…] not (to protect) individual species, **especially highly mobile, pelagic species**," *(Doc. 11)*. Following the FGC's reason for rejection, this argument can be applied to support the case for the allowance of pelagic or HMS take within the listed reserves, because these species, per their pelagic/highly migratory designation, fall into this category.

Pursuing Equitable Policy Through Modernized SMCAs:

The MPA Network was founded on four key pillars with the innovative idea that these pillars would allow for the adaptive management of the system. One of these pillars is policy and permitting which calls for consistent policy across the network to allow for fair network governance.

After the Channel Islands MPAs were established, the remaining network followed. Comparing

the Channel Islands network to the remaining state network we see large shifts toward the partial-take state marine conservation areas (SMCAs) and less overall water coverage.

The Channel Islands network of MPAs covers 21% (318 mi^2) of the total sanctuary waters. Compared to the 16% of state waters currently protected under the network, this means there is a 31% increase in protected areas around the Channel Islands than the rest of the state.

Not only is there an increased area of closures (by percentage) within the Channel Islands network, but also, significantly less relative area open to limited-take. Of the 13 various closures around the island network all but 2 are no-take sections. This only accounts for only 11.43 square miles of water of the 318 square mile closure area, or 3.59% of the sanctuary's closures. By comparison, the state network contains about 40% limited take areas. This is a wide discrepancy between the Channel Islands network and the state network (Over 10 times the relative area around the Channel Islands is no take compared to the rest of the state). If implemented, the percent area of limited take in the Channel Islands Network would roughly mirror the State's 40% limited take figure, bringing more equity to the local region. The raw figures are shown in the table below.

Table 1: Comparison of MPA (no-take) and SMCA (limited take) of the Channel Islands MPAs vs the Entire State MPA Network

	Channel Islands MPA Network (State and Federal Waters)	State MPA Network
% of Waters Protected (no-take and limited take)	21% (~318 mi^2)	16%
% of network that is No-Take	96.41% (~306.58 mi^2)	60%
% of network that is limited take	3.59% (~11.41 mi^2)	40%
% of network that would be limited take if changes implemented*	41.17% (~130.93 mi^2)	<40%

*This assumes the optional "nearshore" closures are not implemented and includes the Channel Islands network in the state network figures.

The goal of these changes is to allow for enough reasonable take of pelagic or HMS at comparable levels of opportunity zones to the rest of the MPA network (~40% partial take allowance). If implemented, the Channel Islands network would still have elevated protected area rates, 21% compared to the state average of 16%, but would provide a better ratio of limited take areas.

Current examples of limited take areas outside of the island network in Southern California include SMCAs such as the Pt. Dume, Abalone Cove, Blue Cavern, and Farnsworth SMCAs *(Doc. 17)*, which allow for some form of pelagic finfish take. Other statewide examples of limited take SMCAs outside Southern California cater to pelagic finfish and salmon, technically not a pelagic finfish by biological definition, but a species that still covers mass distances every year. This petition simply requests that we adapt too and update the Channel Islands network to the same standards we see in the rest of California.

Enforcement Analysis:

On the surface, the opening of limited take for pelagic or HMS in these current no-take MPAs could create additional enforcement issues for F&G Wardens covering these areas. However, upon talking to the warden office and local wildlife officers it was determined this was not the case. It is the intention of this petition that the changes made would be enforced similarly to how current pelagic

allowed SMCA's are enforced. For the local Ventura agency, enforcement would be identical to how officers enforce the Anacapa Island SMCA.

Discussions with the enforcement agency have indicated that there are currently no issues with enforcement in the current pelagic allowed SMCAs. It is their standpoint that the current enforcement regulations are clear and allow officers to make decisions swiftly and appropriately. The current regulation that outlines enforcement of the SMCAs is under California Code of Regulations Title 14 Section 632(a)(1)(C) *(Doc. 18)*. To summarize the code, take or possession of species except specific individuals or groups listed is prohibited. Meaning, under the proposed regulations, the take and possession of pelagic or HMS would be allowed within the conservation area, but the take and possession of non-pelagic or non-HMS species, like groundfish, would be not allowed. There is an added exception that only possession of coastal pelagic species (CPS) would be allowed if an HMS specific option is selected (it is preferred one is). The reasoning for this addition is the allowance for such HMS targeting vessels to possess baitfish that is commonly used to target such species. Due to the clear-cut boundaries of enforcement regulations, and the input from F&G wardens, it was determined that the additional enforcement required by these changes is both minimal and overlaps with current pelagic allowed SMCAs they currently patrol and enforce. In addition, since petition submittal the new GEAs follow a very similar structure to the goals of this petition, and if offshore reefs can be designated GEAs and enforced there is little to no reason why limited take allowances to these MPAs could not be.

Mass Public Support:

The origins of the pelagic allowed zones go back to the original implementation of the Channel Islands MPA network which includes 2 areas for pelagic take. However, the waters these two zones cover are located on the northern side of Anacapa and Santa Cruz islands, areas where very little pelagic/HMS fishing takes place. HMS fishing method trial maps for DSBG and deep drop show a clear picture of the primary pelagic/HMS grounds in southern California *(Doc. 16)*. The maps clearly display most pelagic and HMS fishing occurs on the southern sides of the four northern islands. Almost no fishing efforts are made in the two northern zones. Primarily, most pelagic and HMS targeting fishing around the Channel Islands occurs 2-12 miles south of the northern islands, down the entire 4 island chain. All three of the requested MPA lie in these areas.

Fisheries that actively target or have targeted pelagic or HMS off the northern Channel Islands have wanted these types of changes since the implementation of the network and have commented both in the past and present about the desire to allow for more pelagic or HMS limited take. Comments from 2002 in the CEQA and from 2023 DMR show this desire. However, back in 2002, we did not know nearly as much about the pelagic or HMS migrations and what impacts allowing a small fishery inside these areas could be. Today this is simply not the case. We now know that this change, if implemented, will further streamline current regulations concerning pelagic or HMS, while having a net minimal impact on the local ecosystems inside these MPAs. This petition has the official backing and support of several fishery businesses, groups, and individuals, *Doc. 2 for list and letter*, and also includes a publicly signable petition containing over ~~880~~ 1000 signatures at the time of submittal.

Included Stakeholder feedback and additional information (added January 2025)

Commercial Swordfish:

A large conflict that comes up with the three mentioned Channel Islands MPAs and the commercial swordfish fishery is the 3 MPA's current no-take allowance, which includes the retrieval of legally taken fish.

The harpoon swordfish fishery takes a swordfish by locating a basking fish on the surface and attempting to hit it with a hand thrust harpoon. Once hit, fish are left to tire on a set of gear marked with a flag, if not immediately retrievable. This soak time varies greatly, from 1-8 hours, but it is typically no longer than 2 or 3 hours. In that time, fish could pull gear several miles, 1-5 on average in my experience participating in the fishery. This movement occasionally brings gear into an MPA before being retrievable. Even if fish are taken miles away, there is still a random chance the legally taken fish on harpoon gear ends up inside the closure come retrieval time. There is nothing we can do to stop a swordfish from swimming where it wants to go while on gear.

Similarly, DSBG sets 10 flags with 10 hooks at 1000ft in open waters for swordfish. Swordfish hooked with this method can move gear similarly to harpoon fish in terms of distance. This is because if a hooked fish does not come to the boat immediately, the gear is placed back in the water to let the fish tire and to monitor the remaining set, leaving legally hooked fish the possibility to move into a closure as well.

Both of these problems are more prevalent around the Channel Islands and the three MPAs mentioned in 2023-15MPA because these MPAs extend an additional 3nm offshore into federal waters, overlapping more with the more offshore swordfish-fishery grounds. Today, retrieving a dead harpoon fish or fighting/retrieving a hooked fish inside these no-take closures is illegal, something that should be resolved some way. This is especially the case for harpoon fish, as unlike DSBG fish that could be cutoff or released with a tag, harpoon fish cannot be let go once hit.

This problem is compounded in the commercial swordfish fishery due to the fishery's reliance on calm waters to eyeball or locate a basking swordfish. Of the northern Channel Islands one MPAs in particular, The Footprint, sits in the lee of the islands, the place where the islands act as a physical weather barrier from the normal westerly wind and swell. This calm section was historically important and remains an essential area to the swordfish fishery more than other fisheries because of its reliance on spotting vs hooking a fish. These weather pockets force the fishery to operate in the lee area regardless of the MPA's presence. The result is a higher effort around the MPA, not because there is any more swordfish there than other places, but because that is the only zone that has fishable conditions most days at the Northern Channel Islands. This closer proximity to the MPA due to weather leads to higher chances of interactions where legally taken fish tow gear into the closures as mentioned above. We can see this higher landing rate and therefore higher chance of interactions by observing commercial block catch data showing the blocks containing and surrounding the Footprint, blocks 707 and 708 are especially productive due to the calmer waters. These two blocks alone captured 2.82% of state swordfish landings, locally comprising 15.63% of the swordfish produced by the Santa Barbara Port Area over the last 18 years (MFDE[1]), particularly high values for an HMS.

It is understandable that opening these MPAs simply on the idea that the weather is better than other zones is not a valid reason on its own, but that is not the point. The point is that this calm zone, and the higher effort inside of it, results in higher chances of gear unintentionally moving into the closure. This unique combination of factors gives even more reason to resolve this problem now during this adaptive management process.

As a result, the FGC, CDFW, PFMC, and CINMS should take this interaction into account in order to better consider the individual actions for allowing the harpoon and DSBG fishery access to operate in or, at the very least retrieve, legally taken swordfish within the 3 requested MPAs because of this gear movement problem.

1. MFDE under only swordfish landings from 1/1/2008 to 12/31/2023. The Santa Barbara Port Area was used for the local filters to include Ports around the Channel Islands (petition's area of concern).

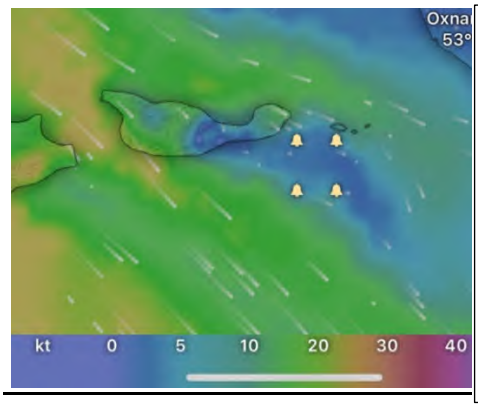


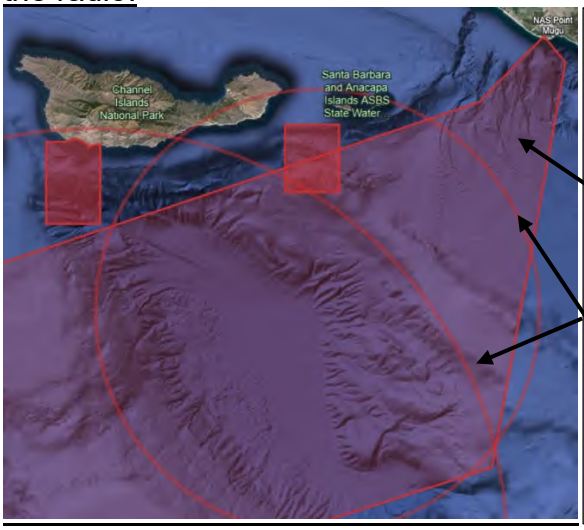
Image depicting average day in the Northern Channel Islands with The Footprint MPA outlined. Displayed wind "lee" for commercial swordfish is predominately around the closure forcing effort and gear interactions with the MPA to be higher (conditions are "fishable" under 10kts, blue color). Wind model used in the NOAA HRRR model mid-day (12:00) during peak effort time.

Local Naval Closures:

From my talks with general HMS fishermen at as many talks as I could attend locally, the issue of military operations off the southern side of the 4 northern Channel Islands was brought up enough time to look into and warrant discussion. The primary argument brought up is, while HMS cover large areas and are fishable outside of the MPAs, military operations close off most and sometimes all fishable area for HMS around the Channel Islands around the northern Channel Islands for local fleets except small areas largely taken up by the two existing MPAs, The Footprint and Gull Island.

While on the water targeting HMS, I have removed from and forced into a different area where no or less HMS are realistically present (more inshore, into foul weather, or into an MPA). There are two types of naval closures on the southern side of the Channel Islands, total range closures and radius closures. Some days one or the other is active and some days both are active depending on the exercise. The location of closure radiuses from operations does vary, but the missile range closure is constant polygon. This zone covers a large area of offshore waters on the southern side of the islands, where HMS effort locally occurs. Included is an image of the points provided to me by the Naval Warfare Center Pt. Mugu depicting the range closure when they are in a live fire event, shaded in light red. The hollow circles depict radius closures from boat coordinates and restricted distances from said positions are enforced by aircraft. Note, a 1.5 nm corridor from land was still permitted for basic transit, so closures did not go all the way to the island shore. The Footprint and Gull Island MPAs have also been included depicting which areas fall inside and outside the missile range.

Event frequency does vary from 0 to 6 days a week, and closure radiuses from boats change based on the activity and number of vessels participating. Currently the only way of acquiring event data is with direct talks with Naval officers <24hr before an event, and in some cases the day of on the radio.



Naval closures at the Northern Channel Islands overlaid with The Footprint and Gull Island MPAs.

The Point Mugu Naval Missile Range closure is the entire light red shaded area.

The two circles are closed radii from vessels operating in the same area, radii closures did leave a 1.5 nm corridor open from the island.

Adaptive Management, the MLPA, and the Master Plans (addition):

Adaptive Management: It should be noted that the adaptive management of the MPA Network is not a one-way street. Adaptive management is defined by Fish and Game Code section 2852(a)[2] as, "a management policy that seeks to improve management of biological resources, particularly in areas of scientific uncertainty, by viewing program actions as tools for learning…" It is a practice where, as conditions change or we learn more about something, in this case the MPA network, we actively amend management regulations to reflect what currently is known to be a reasonable management method. That being said, consistently increasing protected areas or the level of protection for all species in an area every management cycle is not the only direction this process is allowed to go in order to manage the network. If sufficient evidence is provided and goals can still be met, adaptive management can certainly be used to decrease restrictions in cases where we still accomplish the same goals, something Petition2023-15MPA claims is possible due to the lack of or how little pelagic/HMS interactions are with MPA goals, as supported by the Master Plans. If we can still accomplish the stated goals of the network in these specific MPAs while allowing some take of HMS or pelagic species, the network can certainly still be considered improved as a result. The latest example of adaptive management lowering regulation was the repealing of the Cowcod Conservation Areas (CCAs) and implementation of the smaller Groundfish Exclusion Areas (GEAs) after the cowcod population was considered rebuilt and healthy.

The MLPA: The goals of the MLPA and accompanying plans are clear. The largest goal being to preserve local ecosystems, allowing them to grow undisturbed as much as possible by people, resulting in higher levels in local species' abundance and biodiversity for future generations to observe. From the onset of this petition, it has been a foundational idea that allowing take of pelagic or HMS inside these areas will both, not significantly affect local species abundance or populations, as they would still be protected, and that the HMS populations would not be significantly affected by such a change. The argument of lowering protections in a petition like this is understood at face value, but the goal of the petition is to examine if we can accomplish the same or a satisfactory level of the stated goals under these "lower protections."

MPA Master Plans: Appendix G of the 2008 Master Plan[3] discusses the idea of species affected by MPAs, mentioning pelagic and HMS groups are overall less affected. Additionally, as the original petition mentions, the current 2016 MPA Master Plan for the southern section outlines within its goals[4] that areas of protection providing limited pelagic take or HMS take be provided. This is something we do not see around the Channel Islands in nearly comparable amounts to the rest of the state network, this effect is worsened by the federal expansions at the Channel Islands encroaching more into offshore waters where more pelagic fishing occurs. Previous FGC MPA discussions provided additional input on MPAs and HMS interactions where the commission stated that MPAs are intended to protect (local) ecosystems, not individual species, especially those that are highly mobile or pelagic[5]. Both FGC comments, and statements from the 2008 and 2016 Master Plans support the idea that pelagic finfish and HMS are both not as affected by these MPAs and that areas allowing take of just pelagic finfish or HMS be included in the network.

2. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=2852.
3. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=113013&inline#:~:text=Species%20with%20a%20strong%20tendency,their%20entire%20range%20of%20movement.
4. http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=112492&inline (pg. F-5 (Goal 2, specifically point 4))
5. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=207757&inline (pg. 9)

All of the above evidence and precedent came to light after the establishment of the Channel Islands network in 2002, so it is somewhat understandable why the decisions were made back then to leave these areas as no-take zones, we simply did not know as much then as we do now. However, 20 years later with all of this modern evidence and precedent elsewhere along the coast in the 40% of the more-modern coastal network that is limited take, I believe it is more than justifiable to re-evaluate the Channel Islands Network to our current scientific understanding for pelagic/HMS allowed areas in MPAs.

Kelp Restoration and Climate Resiliency:

A final comment of concerns mentions granting limited take access to these areas for Pelagic finfish or HMS will negatively impact local species such as groundfish or those important to kelp restoration and therefore climate resiliency, including but not limited to sheepshead and spiny lobster.

The preferred option of only allowing take of HMS was preferred with species interactions specifically in mind. The more selective list of HMS avoids pelagic finfish species, like yellowtail, that could be targeted with methods that are more likely to interfere with non-pelagic species (weighted, bottom contact dropper loops). HMS effort for tuna or billfish consists primarily of surface casting a jig/bait, trolling baits on the surface, or fishing in the middle of the water column. It is very unlikely those targeting HMS species this way will have many interactions with non-pelagic species such as groundfish. Additionally, pelagic or HMS fishing is done primarily offshore, away from nearshore kelp ecosystems, and away from nearshore areas spiny lobster and sheepshead frequent.

~~The four~~ Options Breakdown including Stock and Fishery Analysis:

This section will discuss the impact the allowed fisheries may have on the species that would primarily be targeted, the pros and cons of the ~~four~~ options, and the possible nearshore closure(s). The discussions on the ~~four~~ options and optional no take zones are meant to provide the thoughts and opinions of pelagic and HMS fishery groups and individuals for the Commission to better understand their viewpoints.

-Pelagic and HMS Stock and Fishery Analysis: Out of all of the HMS, Bluefin tuna migrate the furthest in terms of net geographical distance traveled in their lifetime, with individuals who reach maturity traveling from the coast of California across the pacific to Japan, moving up to 70 miles per day during said migration. Billfish (Swordfish or Marlin) travel in two more distinct groups, rotating from California either toward the mid-pacific and Hawaii or off the coast of Mexico, moving up to 35 miles per day according to tag data. All these species and the other pelagic and HMS affected by this change follow migrations similar these, coming into waters off of California in the early summer (June-July), and mostly departing by early winter (November-December). This migration timeline and fishing attempts toward HMS in California are directly related, meaning most, if not all, fishing will be during these 5-7 months, leaving waters relatively untouched the remaining months of each year.

The fishery impact from these changes would be minimal to the overall take of HMS and their stocks. It is the primary intention of this petition that the species primarily targeted inside of these areas (if HMS or pelagic fishing is allowed), would be swordfish, bluefin tuna, and striped marlin. While some other attempts toward more exotic species such as yellowfin or dorado may occur, it would be rarely available.

Fishery efforts in these MPAs also needs to be considered. Pelagic and HMS do not remain in small areas, rather moving with the water and currents. HMS fishery efforts would not be concentrated inside of these proposed limited-take areas, but rather flow through them as the water these species follow flows through these areas. The fishery would cover the same grounds it does

today, with the changes allowing targeting though these areas compared to having to work around them as these species move through them. The two most targeted species in these areas that would be retained are bluefin tuna and swordfish. Striped marlin would likely be targeted the most in terms of fishing effort, but almost all marlin captures are recreational and result in a release.

According to NOAA the bluefin tuna population is not subject to overfishing and stock assessments show the population has "significantly increased," *(Doc. 13)*. If any of the listed options is accepted, all recreational methods of take would be available for bluefin tuna. A majority of this would be hook-and-line, with spearfishing taking up the remaining numbers. Commercially, only hook-and-line bluefin would be permitted as spearfishing is not a commercial option. A concern that was raised was the allowance of commercial hook-and-line bluefin take within these areas. Some groups believed allowing commercial take would prove to have too much of an impact on the stock. However, observing NOAA commercial landing data we see that California's commercial fishermen only account for 2% of the yearly pacific bluefin that is commercially harvested, meaning the local commercial fishery has a minimal impact on the stock *(Doc. 13)*.

The stock numbers and movements are similar for swordfish as well. NOAA lists the pacific swordfish stock is at safe levels and not subject to overfishing *(Doc. 14)*. The total local impact by California vessels is listed as minimal with a "significant majority" of swordfish landed by Hawaii based longline vessels. Commercially, with the phasing out of the drift gillnet (DGN), both the state and federal agencies have made it readily apparent they are trying to find new ways to better target and expand commercial swordfish in California. All three of these current MPAs lie in the middle of some of the only reliably fishable swordfish grounds in the Channel Islands. All sit downwind of islands that block the wind and provide fair weather for fishing to occur on days fishing elsewhere is not possible under current allowed commercial methods (Harpoon and DSBG). This is especially the case for harpoon swordfish, a fishery that requires flat-calm water. The allowance for partial take of swordfish inside these regions would allow for a larger calm area to be covered and fished for migrating swordfish.

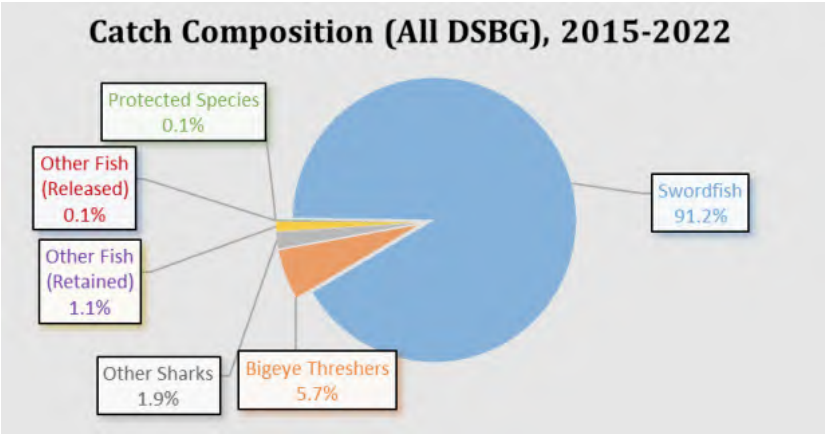
Unlike bluefin, depending on the accepted option, certain allowances for swordfish take would be made, but some may still be restricted. Options 1 and 2, if either are accepted, would allow all recreational methods for take of swordfish. Historically, this has almost exclusively been surface baiting basking swordfish, a fishery with zero deep water impacts, and has near zero impacts on anything in that area except for the swordfish it targets. Recently however, anglers have begun to mirror commercial methods, and have begun placing baited hooks at deeper depths (~900-1000 ft) for swordfish. Under current regulation, this method of "deep dropping" has no difference/distinction between hook-and-line fishing and would therefore be allowed.

For commercial methods of take, harpoon swordfish would be allowed under any accepted option. This globally recognized sustainable fishery with zero bycatch, is a fishery perfectly suited to have as little impact as possible on the local, non-pelagic ecosystems when a fish is taken. However, like the recreational hook-and-line case, the allowance of commercial hook-and-line for pelagic or HMS inside these regions would allow commercial deep drop of swordfish.

Along with deep drop methods, and in the spirit of fairness to the commercial fleets, ~~Options 1 and 2 would also allow~~ the use of standard-deep-set-buoy-gear (DSBG) ~~in the federal waters only of the proposed limited-take areas (as it is currently primarily fished)~~ is proposed in this petition as an isolated action item (see amendment cover letter and revised options). DSBG is currently a federally exclusive fishery, with the exception of one exempted fishing permit (EFP). DSBG is a method consisting of ten separate flags and buoys with one line and one hook on each flag/buoy and is a modern sustainable fishery for swordfish. Due to the nature of these areas overlapping federal waters containing a harpoon allowance (state and federal), the argument for federal authorization of DSBG in these areas is being requested if hook-and-line deep drop is allowed. As previously mentioned, this

change, along with other federal water changes would assumably be made by NOAA and the CINMS working with the state.

These methods of targeting swordfish at depth do have more impact than recreational surface baiting or commercial harpooning. However, the impact of these methods and their bycatch is minimal on non-HMS or pelagic species. This type of fishing has been praised by conservation organizations like Oceana and PEW for its high selectivity and extremely low bycatch (*Links 5/6*). There is also over 10 years of historical catch data for DSBG, the method that hook-and-line deep drop branched from, and 7 years of data from NOAA detailed in the chart below.



Looking at the data we can see that from 2015-2022, DSBG captured 91.2% swordfish, and a 96.9% mix of swordfish and thresher shark (another HMS). Of the "other sharks" and "other fish" most of these species were a mix of other pelagics (i.e., mako sharks, opah, and escolar). This means that nearly 99.8% of all species caught with DSBG are HMS. Almost no non-pelagic or non-HMS species have been landed under this type of fishery, due to its extreme selectivity. In the small number of cases where non-HMS species were hooked, the active tending of this gear allows for most bycatch to be released alive and well. Since deep drop methods mirror DSBG it is reasonable to assume their catch rates would mirror DSBG rates as well. It is for this reason that deep drop and federal authorization of DSBG for swordfish were listed allowances under Options 1 and 2, since they produce the lowest bycatch numbers, but produce the higher success rates for swordfish catch compared to harpoon or surface baiting.

~~If Options 1 and 2 are rejected but Option 3 or 4 are accepted, all HMS or pelagic targeting methods would still be allowed except those going deep to primarily target swordfish. These options call for the use of only "surface fishing methods," a term used to describe all non-deep drop methods. This includes methods such as trolling, live bait casting, lure casting, live bait drifting (on the surface), and all other methods anglers or commercial fishermen use besides deep dropping or DSBG.~~

-The ~~four~~ Options and Their Reasonings: Each of the ~~four~~ options is designed to have a minimal impact on the protected area's local ecosystem but vary in both allowed species and allowed gear types. There are ~~really two~~ several sets of choices, when we break down the ~~four~~ options. The first choice allows either pelagic finfish take and possession, or HMS take and possession with possession of coastal pelagic species (CPS). The logic behind allowing pelagic finfish is primarily the precedent already set on other SMCAs. Pelagic finfish cover the 3 species that would primarily be targeted (swordfish, bluefin tuna, and striped marlin), cover other pelagic species that would occasionally be targeted, and have existing SMCAs elsewhere that already allow for this subset of species. However, this list also covers more species than the HMS list, and as will be discussed, these extra species may pose undesirable issues if limited-take implementations are not made properly. The logic behind allowing HMS take and possession, and CPS possession is that the three targeted species also fall under this more selective classification of species. Meaning there would be a more selective list of species allowed to be taken, thus less overall impact on what could be done inside these areas. Allowing only HMS limited take would also avoid the possible pelagic finfish issues discussed below. The reasoning for the CPS allowance is it would allow common baitfish used to fish HMS to still be retained inside of these areas.

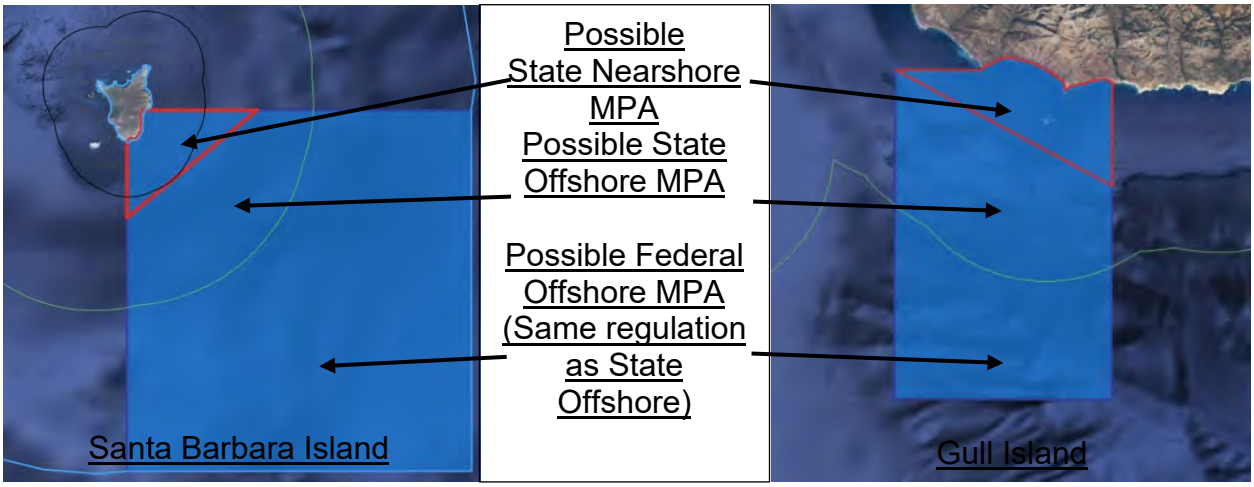
The second choice is the allowance of all hook-and-line methods, restricting "bottom-contact-gears" for better groundfish/bycatch avoidance, or not allowing any hook-and-line gears, just allowing spearfishing and harpoon methods. This is a tiered choice increases in selectivity of gears. Non-restricted hook-and-line of pelagic finfish or HMS of course would give the most access, restricting of bottom-contact-gears is the middle ground which mirrors federal GEAs, and the most selective is the removal of all hook-and-line for just spear and harpoon fishing. Any of these selections can be paired to a pelagic finfish or HMS allowance, making up the 6 total options. ~~including deep drop, and DSBG, or only allowing "surface fishing methods." The logic with allowing deep drop and federal DSBG allowance is the data shows that these methods are extremely selective and prove effective in targeting primarily swordfish at depth. This choice would allow for more area of opportunity to selectively target swordfish, something the State, NOAA, and PFMC has made very apparent they want to help accomplish, especially commercially with the end of the gillnet dropping landings of California swordfish. The logic with allowing "surface fishing methods" is an attempt at regulating out the deep dropping methods inside of these zones if the State deems them too impactful to allow. If this choice is made, it would make the limited-take areas more selective to swordfish methods only, leaving surface baiting recreationally and harpooning commercially as the only allowed methods to target swordfish. If this option is selected, the state would have to clearly define "deep dropping" (to not allow it) or define "surface fishing methods" (to only allow those).~~

In addition to the ~~four~~ main options, there exists the isolated action for DSBG and a final choice of adding a nearshore closure to the Gull Island and SBI zones with more selective or no fishing methods being allowed. The selected limited take option would then be implemented outside of this boundary throughout the remaining "offshore" area. The logic behind this choice has several factors, some of which are the existence of a nearshore/offshore pair in the Farnsworth and Point Buchon SMCAs, and the desire to continue having stricter limited-take or no-take regions closer to the more diverse shorelines. These nearshore regions rarely contain any species this petition intends on anglers targeting, meaning whether or not a nearshore zone is implemented, areas this close to the respective islands would have such a low fishery presence that they would effectively remain untouched, with one key exception.

If an option allowing the hook-and-line take of pelagic finfish is made it is recommended that the nearshore region be implemented. This is due to the fact that limited-take of pelagic finfish by hook-and-line would allow certain game fish species to be targeted in the local, nearshore ecosystems on fishing beds. The intent of this petition is to protect from this type of fishing allowance, intending limited take allowance for these regions to be open water fishing of pelagic or highly migratory species during their movements. This possibility of nearshore bed fishing is only the case for two species on the pelagic finfish list, yellowtail and barracudas. These are species that if pelagic finfish were allowed with no nearshore zone implemented, would definitely be targeted within the nearshore areas of the SBI and Gull Island closures. Again, it is the intention of this petition to only allow for offshore take of pelagic or highly migratory species, primarily billfish and tuna. Allowing pelagic finfish with no nearshore region that accounts for bed fishing of pelagic species such as yellowtail may interfere with the local ecosystem we still aim to protect. If the below listed coordinates are the border for the nearshore regions (table 2), the water outside of these areas at Gull Island and SBI is reasonably deep enough to ensure little to no effort would be made to target these species and would yield almost zero results.

~~Table 2: Proposed Coordinates and options for the Nearshore limited or no take areas for Gull Island and Santa Barbara Island~~	
~~Gull Island Nearshore MPA~~	~~Santa Barbara Island Nearshore MPA~~
~~33° 58.000' N. lat. 119° 53.000' W. long, and 33° 55.800' N. lat. 119° 48.000' W. long~~ ~~Regulation within nearshore area:~~ ~~Recreational and commercial take of (pelagic finfish or HMS, depending on the state's choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred)~~ ~~Or~~ ~~A no-take region (not preferred)~~	~~The 1nm boundary of SBI within the current MPA~~ ~~Regulation within nearshore area:~~ ~~Recreational and commercial take of (pelagic finfish or HMS, depending on the state's choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred)~~ ~~Or~~ ~~A no-take region (not preferred)~~

Table 2: Proposed Coordinates and options for the Nearshore limited or no take areas for Gull Island and Santa Barbara Island (Amended)	
Gull Island Nearshore MPA	Santa Barbara Island Nearshore MPA
The nearshore-offshore boarder would be bound by a straight line running from 33° 58.000' N. lat. 119° 53.000' W. long, to 33° 55.800' N. lat. 119° 48.000' W. long. within the existing MPA. Regulation within nearshore area: The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spearfishing is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed*. (*Only needed if HMS option is selected) (Preferred Choice) Or A no-take region (not preferred)	The nearshore-offshore boarder would be bound by a straight line running from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W within the existing MPA. Regulation within nearshore area: The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spearfishing is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed*. (*Only needed if HMS option is selected) (Preferred Choice) Or A no-take region (not preferred)



The listed coordinates for the nearshore closures are only the listed coordinates for the dividing line between the proposed nearshore area and the offshore limited take SMCA and FMCA. The collective closure borders of the nearshore and offshore areas would be the same area as the current MPAs. If these are placed in effect along with the selected option applied outside, these nearshore regions would cover sufficient area to prevent nearshore bed-fishing efforts. While possible changes to these borders may be made, it is the fisheries' belief they are sufficient in preventing what would otherwise be a problem if an unrestricted pelagic finfish option is accepted. Further consultations with active fishery members should be made if these borders are desired to be modified. The preference for stricter limited-take rather than no-take is simply that these areas would contain so little presence of these species, that they would effectively be fully protected, but have rare opportunity for the selective allowed methods in them. In addition, as the preferred nearshore allowed methods mirror those in options 5 and 6, these nearshore areas are only needed if a hook-and-line option (1-4) is granted.

The Most Requested Option and Closing Remarks:

It is this petition's preference that in order to avoid the nearshore pelagic finfish risk all together, one of the ~~two~~ three HMS allowance options be selected (Options 2, 4, or 6) with the nearshore zone not selected. Option 2 is the preferred selection since this option allows for the most HMS opportunity, recreationally and commercially, while still remaining extremely selective, and leaving a minimal impact on the local, non-pelagic ecosystems. Option 2, with no accompanying nearshore zones would allow for HMS targeting within the entire area. In the unlikely case HMS are present nearshore, they may still be targeted with minimal local impact as they move through an area under the same selective fishing methods allowed elsewhere. The lack of nearshore zones in this case would also allow for easier enforcement of the area by wardens not having to worry about different zones within an area. If a nearshore region is desired, the more selective limited-take option is preferred. This change would still allow for selective enough take of HMS and prevent any bottom fishing activity nearshore.

In terms of the three MPAs, all three MPAs would preferably be converted to limited take areas. Discussions with those involved in the possible affected fisheries revealed a strong preference for The Footprint to be converted to limited take, with Gull Island and SBI having equal amounts of preference to be opened to limited take.

In closing this analysis, special thanks to all the individuals who provided the input and data to make this petition possible. I would especially like to thank the FGC and its staff for their assistance with and the creation of this adaptive management process.

Remaining Supporting Documents and Sources:

Document 2: Supporters letter for the petition. Summarizes the petition, its reasonings, and its intentions. Was sent out to business and individuals that could be impacted by this change or provide scientific input asking for their support of the petition and its rationale (signature list on the letter).

Dear FGC,

On behalf of the hundreds of thousands of anglers that frequent Southern California, and all of the businesses they support, the following organizations and individuals extend their special support and ask for your approval of this petition. This petition would allow for the limited recreational and commercial take of Pelagic Finfish or Highly Migratory Species (HMS) via select, sustainable fishing methods. The changes would apply to the following Marine Protected Areas (MPAs):

- The Footprint Marine Reserve
- Gull Island Marine Reserve
- The Santa Barbara Island Marine Reserve

This proposed regulation modification aims to return extremely selective take opportunities that the original MPA network implementation unintentionally removed. These regions would become state and federal marine conservation areas (SMCAs/MCAs) but would still provide the original protections to the species and ecosystems each of the MPAs intends to preserve.
The allowance of pelagic or HMS in these areas would provide more equal opportunities to anglers around Southern California targeting fast moving species, like billfish or tuna. Currently, these species cannot be followed into these zones as they move through them, traveling with the currents rather than remain on the structure or in the local ecosystems the MPAs are intended to protect. If accepted, anglers would have the opportunity to follow these species as they constantly flow in and out of these areas.
The push for this change is backed by the California State 2022 MPA Decadal Review, the MRC's near-term objectives, the 2016 MPA Master Plan, and several other state and federal reports/comments. We the fisherman, groups, clubs, and business owners, of California kindly ask for your approval of this petition.

Sincerely,

AFTCO
CCA California
Pfleger Institute of Environmental Research (P.I.E.R.)
Wild Oceans
BD Outdoors
Bear Flag Fish Co.
Bluewater Seafood
Chula Seafood
The Tuna Club
Balboa Angling Club
CISCOS Sportfishing
Hooks Sportfishing
Legit Sportfishing
Erics Tackle Shop
Channel Coast Marine
Executive Yachts
Bight Sportfishing
Bad Company Fishing Adventures
Seal Beach Fish Co.
Wild Local Caught Seafood
Santa Monica Seafood
Ocean Pride Seafood
Santa Barbara Fish Market

Special Individuals: Chugey S, Theresa L, Casey S, Nathen P, Ron H, Sean B, Morgan L, Bill S, Donald K, Christian H, Andrew W, Carl S, Michael M, Thomas C, Wes L, Marc H, Eric H, Bryce H, Ethan H, Steve W, Don G, Ryder D, Fisher D, Jonnah G, Jake K, Brandon H, Patrick O, John J, Bill W, Steve M, Eric H, Sean S, Ryder A, Evan K

And the over 880 members of the public that have signed the public support petition as of submittal (11/22), visible here: https://chng.it/2wy2dHSS6r

Documents 3, 4, and 5: Original founding reasoning for the Footprint, Gull Island, and Santa Barbara Island MPAs respectively, to be created and expanded into federal waters of the marine sanctuary from the Channel Islands CEQA in 2002. There is little to no mention of pelagic or HMS species, with primary objectives for the Footprint MPA being groundfish replenishment, and for Gull Island and SBI MPAs, being either or a mix of abalone, rockfish, or endangered bird populations. Original paper found here: https://nrmsecure.dfg.ca.gov/FileHandler.ashx?DocumentID=151023

Footprint State Marine Reserve

The Footprint SMR is located in open waters in the passage south of Santa Cruz and Anacapa Islands. The Footprint SMR is 28.6 nm^2, **6.4 square nautical miles of which would be within State waters and the rest** ~~entirely~~ within Federal waters. It is described and analyzed here as a part of the entire recommendation, but not the decision before the Fish and Game Commission. The majority of the proposed Footprint SMR is sand or gravel between 90-900 ft. The Footprint includes several submerged rocky features, including pinnacles and submarine canyons that once supported large population of numerous rockfish species. Today, the rockfish populations around the Footprint are severely depleted from intensive recreational and commercial fishing in the region. Although populations are depleted, the habitat supports a variety of species, including bocaccio and cowcod, both recognized as overfished by the PFMC. Fish populations in the vicinity of the Footprint are likely to respond to protection within a reserve through increased density, individual size, and reproductive potential.

Gull Island, Santa Cruz Island State Marine Reserve

The Gull Island SMR is located on the southwest side of Santa Cruz Island. The reserve includes 2.9 nautical miles of shoreline from Morse Point to the point along the shore at 33° 58' N, 119° 48' W. The reserve extends south approximately three nautical miles to the State waters boundary. The Gull Island SMR contains 16.2 square nautical miles. A subsequent Federal waters phase would add 22.1 square nautical miles for a cumulative total of 38.3 square nautical miles.

Historically, Gull Island supported a diverse and abundant marine fauna. Although these populations are reduced, the habitat supports a variety of species. Fish populations in the vicinity of Gull Island are likely to respond to protection within a reserve through increased density, individual size, and reproductive potential. The Gull Island SMR would protect a variety of different habitat types from the nearshore to the continental slope. Sand beach is the predominant shoreline habitat at the border of the Gull Island SMR. Endangered snowy plovers may occur there and the beach supports one of the few populations of pismo clams at the islands. The remaining shoreline is covered with cobble beaches.

Subtidal habitats in the Gull Island SMR are mixed sand and rocky reefs. Red and green algae dominate inshore areas. Gull Island supports an intermittent population of giant kelp, but the kelp populations are reduced. Subtidal habitats support patchy populations of surfgrass. Rocky intertidal and subtidal habitats once supported populations of red, pink, white, and black abalone, but only a small population of red abalone, and very few black abalone have been observed recently. The Gull Island area supports large populations of purple urchins. Rocky subtidal habitats from Gull Island to Laguna Point support populations of spiny lobster. Purple hydrocoral (*Allopora*) is found in deeper rocky reefs around Gull Island.

Shallow rocky habitat extends offshore to Gull Island. Nearshore reefs support populations of various rockfish species. However, rockfish are not as diverse in this region because of physical changes associated with the mixing of warmer waters from the California Counter Current with cooler waters from the California Current. Southern species such as

5-27

California sheephead and wrasses are relatively common in the Gull Island region. The region also supports spawning populations of white seabass and halibut. Thresher and mako sharks are fished in the deeper waters near stronger currents.

Santa Barbara Island State Marine Reserve

Santa Barbara Island SMR is located at the southeast side of Santa Barbara Island. The reserve includes one nautical mile of shoreline from South Point to the eastern point of the

5-22

island. The reserve boundaries extend east and south to the State waters boundary. The Santa Barbara Island SMR contains 13.**2** square nautical miles. A subsequent Federal waters addition would add 46.3 square nautical miles for a cumulative total of 59.**5** square nautical miles.

Santa Barbara Island, Sutil Island, and Shag Rock support major seabird and marine mammal colonies. Santa Barbara Island supports breeding colonies of numerous seabirds, including the endangered California brown pelican, western gull, black oystercatcher, black storm-petrel, Leach's storm-petrel, Brandt's cormorant, pelagic cormorant, Cassin's auklet, pigeon guillemot and Xantus's murrelet. California sea lions haul out on sandy beaches on the southeastern side of Santa Barbara Island. Harbor seals and northern elephant seals occasionally haul out in the same place.

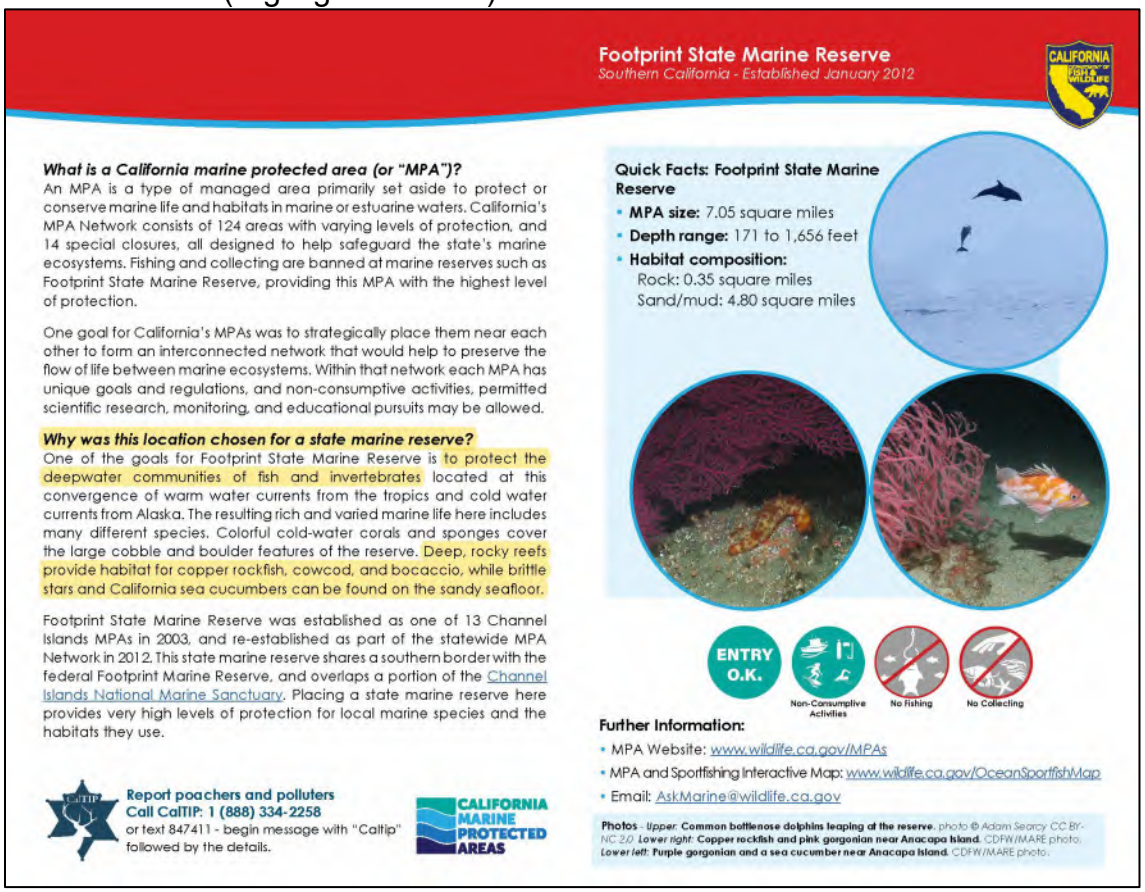
The exposed rocky shoreline along Santa Barbara Island is interspersed with occasional cobble beaches (10-12 m wide) in protected coves. The rocky intertidal habitat descends steeply to patchy reefs in large areas of sand. Patchy populations of surfgrass grow on subtidal rocks (15-20 m). Populations of giant kelp on reefs around Santa Barbara Island have declined relative to historical data. Red and purple sea urchins and brittle stars (*Ophiothrix*) dominate the rocky subtidal habitats around Santa Barbara Island. Spiny lobsters are abundant in rocky subtidal habitats in the vicinity of South Point and large mussel beds can be found in the rocky intertidal habitats on the southeastern side of Santa Barbara Island.

The continental shelf drops to approximately 200 m less than ½ mile from shore, and continues to drop to 400 m within 3 miles of Santa Barbara Island. In the past, populations of white, green, pink, and black abalone inhabited intertidal and subtidal rocky habitats. The reserve includes rocky subtidal habitats, from approximately 25-66 m, that may contribute to the recovery of the endangered white abalone. Sandy subtidal habitats support halibut populations near the northern border of the Santa Barbara Island SMR. California sheephead have been observed near South Point.

Document 6: Original 2002 CEQA: Dr. Ray Hilborn stating the size of an MPA must be large relative to a species' total movement to be actually impactful on their population abundance.

has reached population levels which increase natural mortality rates...@ Likewise, Dr. Ray Hilborn of the University of Washington=s College of Ocean and Fishery Sciences noted in comments on proposals for marine reserves in the Sanctuary that, A...it is almost universally accepted that exploitation reduces population sizes.... No-take areas, so long as their size is large relative to the movement of the species, will lead to increased abundance within the reserve.@

Documents 7, 8, and 9: Current Footprint, Gull Island, and SBI MPA descriptions in "Why the location was chosen…" (Highlighted below)



Footprint State Marine Reserve
Southern California - Established January 2012

What is a California marine protected area (or "MPA")?
An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Footprint State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?
One of the goals for Footprint State Marine Reserve is to protect the deepwater communities of fish and invertebrates located at this convergence of warm water currents from the tropics and cold water currents from Alaska. The resulting rich and varied marine life here includes many different species. Colorful cold-water corals and sponges cover the large cobble and boulder features of the reserve. Deep, rocky reefs provide habitat for copper rockfish, cowcod, and bocaccio, while brittle stars and California sea cucumbers can be found on the sandy seafloor.

Footprint State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. This state marine reserve shares a southern border with the federal Footprint Marine Reserve, and overlaps a portion of the Channel Islands National Marine Sanctuary. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Footprint State Marine Reserve
- **MPA size:** 7.05 square miles
- **Depth range:** 171 to 1,656 feet
- **Habitat composition:**
  Rock: 0.35 square miles
  Sand/mud: 4.80 square miles

ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:
- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Common bottlenose dolphins leaping at the reserve.** photo © Adam Searcy CC BY-NC 2.0 *Lower right:* **Copper rockfish and pink gorgonian near Anacapa Island.** CDFW/MARE photo. *Lower left:* **Purple gorgonian and a sea cucumber near Anacapa Island.** CDFW/MARE photo.

Gull Island State Marine Reserve

Southern California - Established January 2012

What is a California marine protected area (or "MPA")?

An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Gull Island State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?

One of the goals for Gull Island State Marine Reserve is to protect the diverse submarine canyon, rocky reef and pinnacle, kelp forest, and sandy plain habitat found at this location, where warm water currents from the tropics and cold water currents from Alaska converge. These habitats are used by a rich and varied selection of marine fish and invertebrates such as purple hydrocoral, a species not often seen in the Northern Channel Islands. Kelp forests and reefs provide shelter for opaleye, California spiny lobster, and cabezon, while schools of California barracuda and bonito may be seen in deeper, offshore waters.

Gull Island State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. The reserve shares a southern border with the federal Gull Island Marine Reserve, and overlaps a portion of the Channel Islands National Marine Sanctuary and Channel Islands National Park. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Gull Island State Marine Reserve

- **MPA size:** 19.93 square miles
- **Shoreline span:** 3.2 miles
- **Depth range:** 0 to 2,205 feet
- **Habitat composition:**
  Rock: 4.03 square miles
  Sand/mud: 16.55 square miles

ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:

- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Gull Island**, *photo by R.Schwemmer, NOAA/CINMS.* ***Lower right:*** **Purple hydrocoral and sea urchin at Gull Island State Marine Reserve**, *CDFW photo by D. Stein.* ***Lower left:*** **Opaleye in the kelp forest at Gull Island State Marine Reserve**, *CDFW photo by D. Stein*

Santa Barbara Island State Marine Reserve

Southern California - Established January 2012

What is a California marine protected area (or "MPA")?

An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Santa Barbara Island State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?

One of the goals for Santa Barbara Island State Marine Reserve is to protect the sandy seafloor, surfgrass, kelp forest, and rocky nearshore habitat found there. Sea urchins, California mussels, and acorn barnacles thrive along the island's rocky coastline. Giant sea bass, California sheephead, and Pacific angel sharks hunt and seek shelter in the island's kelp forests and eelgrass beds, while California halibut and other flatfish rest in the sandy sediments. Santa Barbara Island is also home to a large breeding colony of Scripps's murrelet, a seabird on California's threatened species list, and fourteen other species of bird.

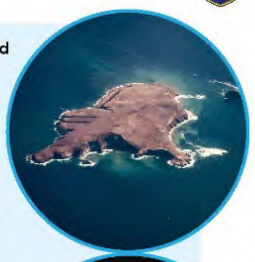
Santa Barbara Island State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. This state marine reserve shares a southeastern border with the federal Santa Barbara Island Marine Reserve. The reserve overlaps part of the Channel Islands National Park and Channel Islands National Marine Sanctuary. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Santa Barbara Island State Marine Reserve

- **MPA size:** 12.77 square miles
- **Shoreline span:** 0.8 miles
- **Depth range:** 0 to 1,655 feet
- **Habitat composition:**
  Rock: 0.74 square miles
  Sand/mud: 2.43 square miles



ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:

- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Aerial view of Santa Barbara Island**, *photo © Jesse Hodge CC BY-NC-ND 2.0.* ***Lower right:*** **Pacific angel shark at Santa Barbara Island State Marine Reserve**, *CDFW/MARE photo.* ***Lower left:*** **Pink gorgonian at Santa Barbara Island State Marine Reserve**, *CDFW/MARE photo.*

Document 10: MPA Master plan goal for the southern section, that calls for the protections of at-risk local species while allowing for limited take of pelagic or HMS.

Goal 2. To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted.

1. Help protect or rebuild populations of rare, threatened, endangered, depressed, depleted, or overfished species, and the habitats and ecosystem functions upon which they rely.[14]
2. Sustain or increase reproduction by species likely to benefit from MPAs, with emphasis on those species identified as more likely to benefit from MPAs, and promote retention of large, mature individuals.[15]
3. Sustain or increase reproduction by species likely to benefit from MPAs with emphasis on those species identified as more likely to benefit from MPAs through protection of breeding, spawning, foraging, rearing or nursery areas or other areas where species congregate.
4. Protect selected species and the habitats on which they depend while allowing some commercial and/or recreational harvest of migratory, highly mobile, or other species; and other activities.

Document 11: Denied petition for White Shark MPA on grounds MPAs are **especially not focused** on pelagic or HMS (Highlighted below)

Appendix G: Decadal Management Review Supplemental Tables

CALIFORNIA MARINE PROTECTED AREAS

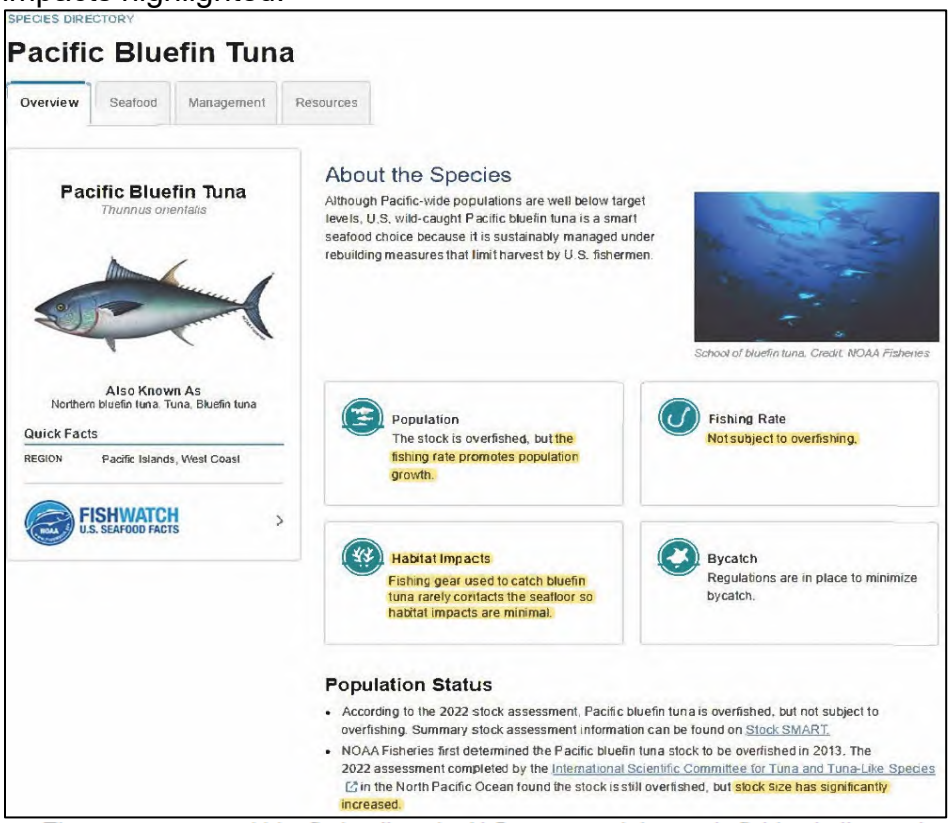
ACTION TYPE	YEAR	REQUEST	RATIONALE	ADAPTIVE MANAGEMENT ACTION TAKEN
Petition denied	2020	Petition submitted to amend MPA regulations to allow surfboard fishing at the South La Jolla SMR.	California Constitution, Article 1 Section 25, recreational take from a surfboard, even catch-and-release is not a fishery	No fishing is allowed in SMR per design criteria
Petition denied	2020	Petition submitted to establish MPA at Padaro Beach, Carpinteria, to protect great white shark nursery grounds.	An MPA with boating and fishing restrictions at Padaro Beach, Carpinteria, will help protect white shark nursery grounds.	MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species
Petition denied	2020	Petition submitted to add unlimited recreational take of invasive species *Sargasum horneri* in Crystal Cove SMCA	CDFW failed to respond and stop the spread of the invasive species *Sargassum horneri,* plus *Sargassum horneri* is not a marine resource.	No recreational culling permitted within MPAs.

Document 12: MPA Decadal Review-Appendix A: Comprehensive Recommendations for the Review-Recommends to open legacy grounds and allow pelagic/HMS take in MPAs (Highlighted below)

Regulatory and Review Framework

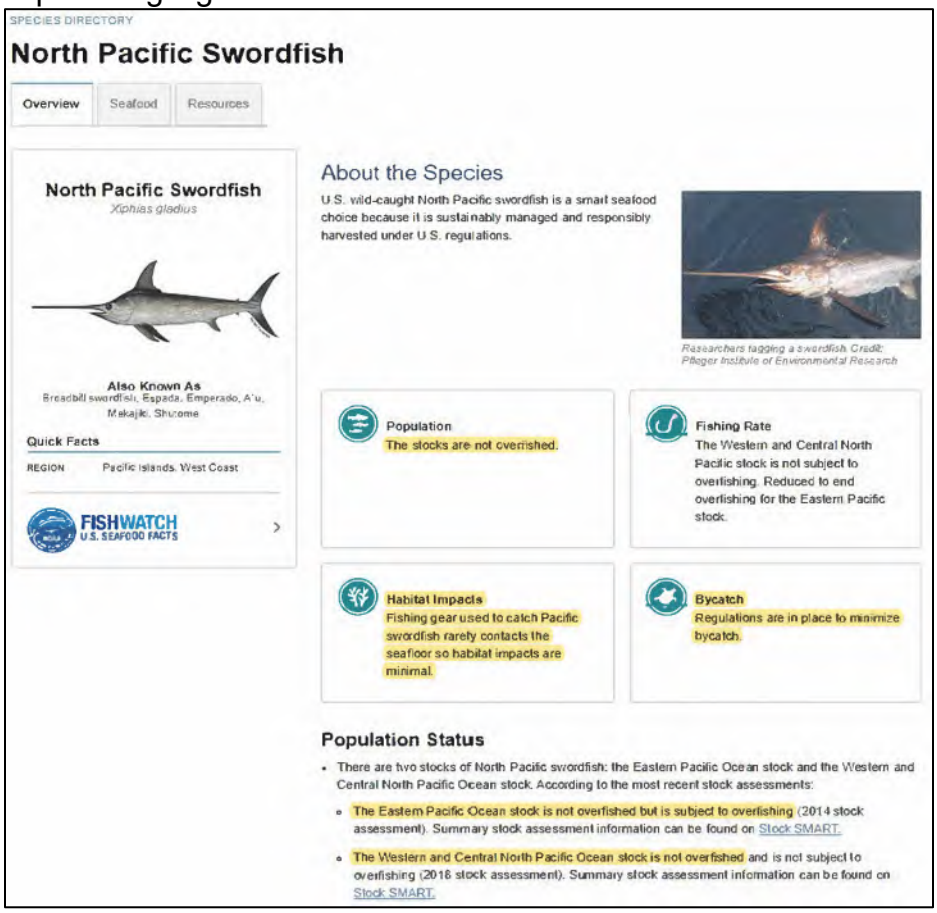
- Conduct annual engagement meetings with stakeholders to inform them about MPA Management Program activities that inform decadal reviews.
- Define clear management reporting goals, including the scale of reporting at the statewide, regional, or local scale.
- Ensure that adaptive management changes to individual MPAs and the MPA Network are evidence based.
- Simplify designations by changing no-take SMCAs to SMRs after maintenance of existing infrastructure is permitted.
- Return MPA fishing opportunities, especially in legacy fishing areas that were previously open to fishing.
- Allow take of migratory and pelagic species in MPAs that currently do not allow it.
- Allow commercial urchin take in MPAs that allow commercial lobster take.
- Do not allow boat operations within 100 yards of a remnant kelp forest within MPAs.
- Requests to change specific MPAs (not including formal petitions; see Appendix G):
  - Relocate Piedras Blancas MPA north, just south of Cape San Martin to protect nursery grounds.
  - Increase the size of Matlahuayl State Marine Reserve to include Point La Jolla and the Boomer Beach area where the sea lion colony is located.

Document 13: NOAA Stock and Fishery Analysis for Bluefin Tuna, stock status, and minimal habitat impacts highlighted.



- The average annual bluefin landings by U.S. commercial vessels fishing in the eastern Pacific Ocean represent only 2 percent of the average annual landings from all fleets fishing there.

Document 14: NOAA Stock and Fishery Analysis for Swordfish, stock status and minimal habitat impacts highlighted.



SPECIES DIRECTORY

North Pacific Swordfish

Overview | Seafood | Resources

North Pacific Swordfish
Xiphias gladius

Also Known As
Broadbill swordfish, Espada, Emperado, A'u, Mekajiki, Shuome

Quick Facts

REGION Pacific Islands, West Coast

FISHWATCH U.S. SEAFOOD FACTS

About the Species

U.S. wild-caught North Pacific swordfish is a smart seafood choice because it is sustainably managed and responsibly harvested under U.S. regulations.

Researchers tagging a swordfish Credit: Pfleger Institute of Environmental Research

Population
The stocks are not overfished.

Fishing Rate
The Western and Central North Pacific stock is not subject to overfishing. Reduced to end overfishing for the Eastern Pacific stock.

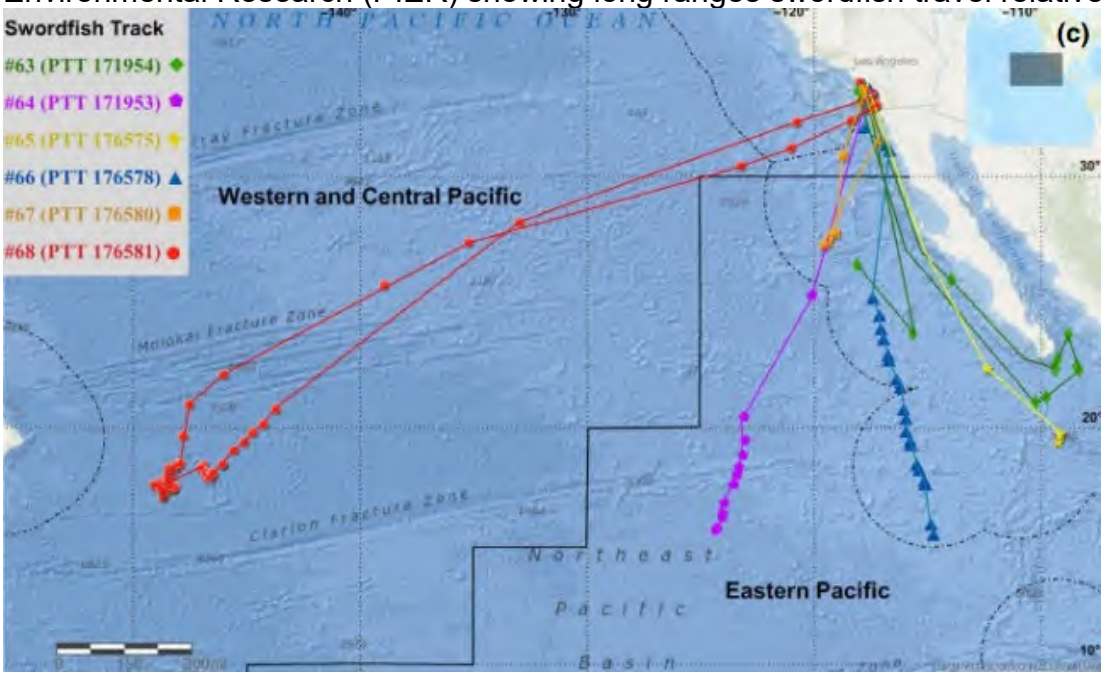
Habitat Impacts
Fishing gear used to catch Pacific swordfish rarely contacts the seafloor so habitat impacts are minimal.

Bycatch
Regulations are in place to minimize bycatch.

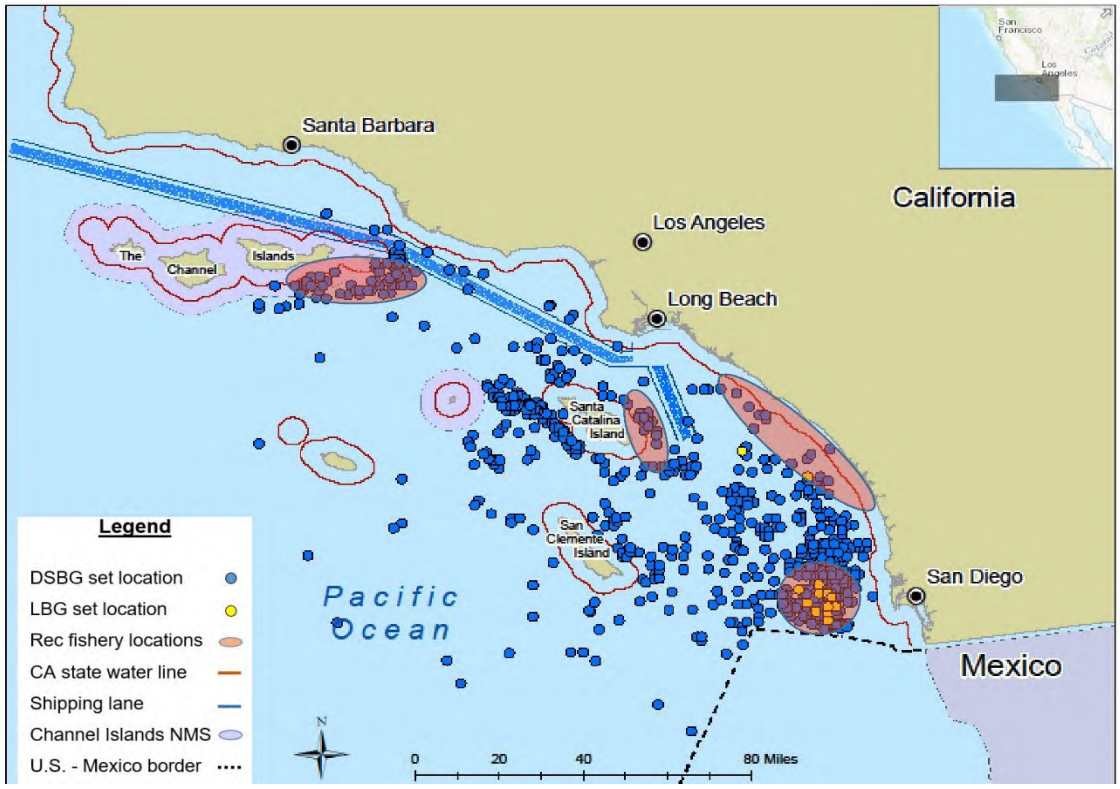
Population Status

- There are two stocks of North Pacific swordfish: the Eastern Pacific Ocean stock and the Western and Central North Pacific Ocean stock. According to the most recent stock assessments:
  - The Eastern Pacific Ocean stock is not overfished but is subject to overfishing (2014 stock assessment). Summary stock assessment information can be found on Stock SMART.
  - The Western and Central North Pacific Ocean stock is not overfished and is not subject to overfishing (2018 stock assessment). Summary stock assessment information can be found on Stock SMART.

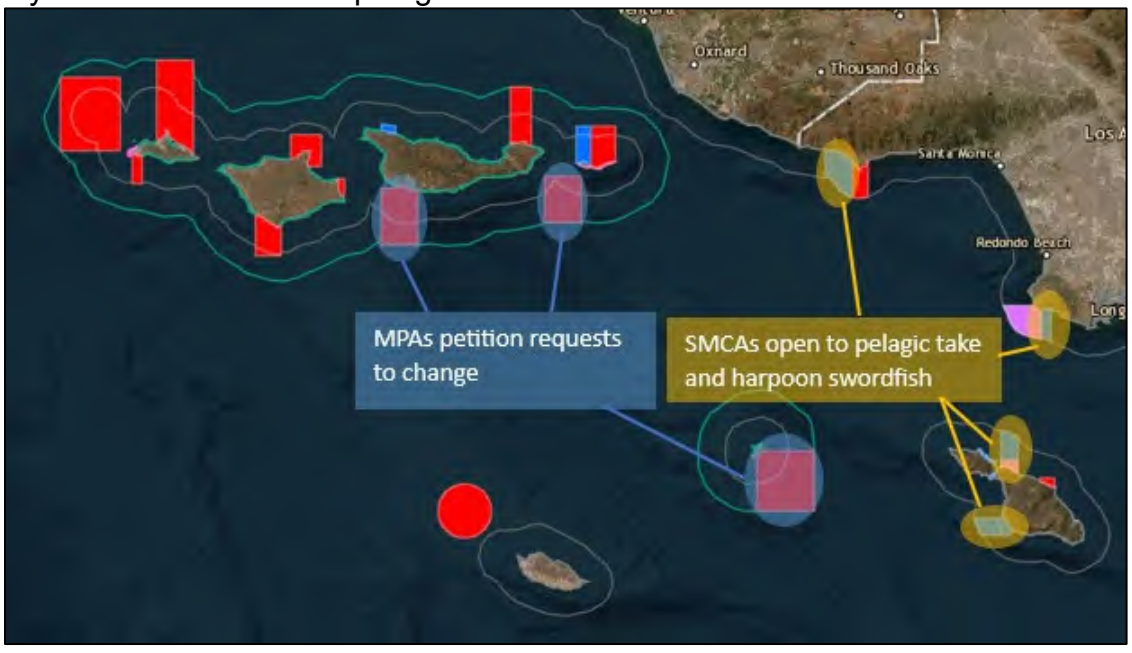
Document 15: Swordfish migration data collected via satellite tags deployed by the Pfleger Institute of Environmental Research (PIER) showing long ranges swordfish travel relative to the MPAs.



Document 16: DSBG and deep drop fishery efforts map displaying the wide area HMS fishing activity covers, and lack of northern Santa Cruz and Anacapa island efforts, where the only 2 SMCAs are located.



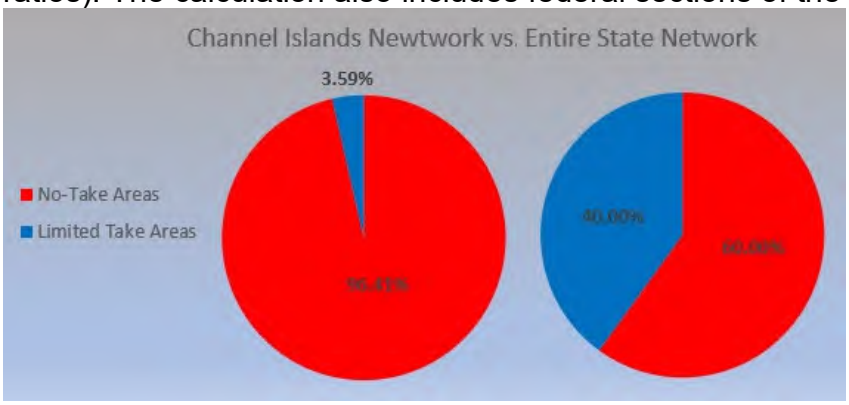
Document 17: Current pelagic finfish limited take SMCAs outside of the Channel Islands Network. These limited take MPAs were implemented in 2012, after the island network in 2003, and display the 9 year shift toward more pelagic allowed areas.



Document 18: Definition of State Marine Conservation Areas per California Code of Regulations Title 14 Section 632(a)(1)(C). The recommended change would make these MPAs effectively SMCAs and MCAs with limited HMS take and CPS possession.

(C) State Marine Conservation Areas: In a state marine conservation area, it is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for commercial or recreational purposes, or a combination of commercial and recreational purposes except as specified in subsection 632(b), areas and special regulations for use. The department may issue scientific collecting permits pursuant to Section 650. The commission may authorize research, education, and recreational activities, and certain commercial and recreational harvest of marine resources, provided that these uses do not compromise protection of the species of interest, natural community, habitat, or geological features.

Document 19: Charts displaying no-take vs limited-take areas around the Channel Islands vs. the whole State MPA Network showing the disparity of no-take areas around the islands. If the changes are made, this disparity would all but disappear (see Table 1 in the analysis for before and after ratios). The calculation also includes federal sections of the MPAs.



Document 20: How the regulatory language could read if the preferred proposed change was selected (limited HMS take, deep drop methods and federal DSBG allowed, no nearshore closure) **NOTE:** Existing regulation modifications presented similar to how CDFW shows yearly changes, ~~crossed out~~ being removed regulation and red being the amended regulation. State and federal sections are listed with proposed changes. For simplicity the federal amendments will follow the states for the MPA specific changes.

State and Federal Definition Modifications-
Amend: 14 CCR § 632 (a)** **and** 15 CFR 922.71:

(13) Highly Migratory Species. Highly migratory species, for the purpose of this section, are a subset of finfish defined as: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). *Marlin is not allowed for commercial take

(14) Coastal Pelagic Species: Coastal pelagic species, for the purpose of this section, are a subset of finfish and invertebrates defined as: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens).

**(13) and (14) exclusive to 14 CCR § 632 (a), amendments to 15 CFR 922.71 would read identical but not include "(13)" and "(14)." Highly Migratory species and Coastal Pelagic species are defined under State regulations (Title 14 §1.49 and 1.39), meaning the change to Title 14 § 632 (a) may not be required.

State MPA Modifications-
Amend: 14 CCR § 632 (b) (109)

(109) Gull Island State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed except where noted:

33° 58.065' N. lat. 119° 50.967' W. long.;

33° 58.000' N. lat. 119° 51.000' W. long.;

33° 58.000' N. lat. 119° 53.000' W. long.;

33° 55.449' N. lat. 119° 53.000' W. long.; thence eastward along the three nautical mile offshore boundary to

33° 54.257' N. lat. 119° 48.000' W. long.; and

33° 57.769' N. lat. 119° 48.000' W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.
2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

Amend: 14 CCR § 632 (b) (114)

(114) Footprint State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the straight lines connecting the following points in the order listed except where noted:

33° 59.300' N. lat. 119° 30.965' W. long.;

33° 57.510' N. lat. 119° 30.965' W. long.; thence eastward along the three nautical mile offshore boundary to

33° 57.264' N. lat. 119° 25.987' W. long.;

33° 59.300' N. lat. 119° 25.987' W. long.; and

33° 59.300' N. lat. 119° 30.965' W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.

2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

Amend: 14 CCR § 632 (b) (116)

(116) Santa Barbara Island State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed except where noted:

33° 28.500′ N. lat. 119° 01.813′ W. long.;

33° 28.500′ N. lat. 118° 58.051′ W. long.; thence along the three nautical mile offshore boundary to

33° 24.842′ N. lat. 119° 02.200′ W. long.; and

33° 27.911′ N. lat. 119° 02.200′ W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.
2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

NOTE: It may not be required to mention deep-set-buoy-gear (DSBG) in the state regulation as it would not be allowed in state waters. However, as all regulations (State and federal) may be listed under one "rulebook" this mention of federal DSBG allowance maybe needed.

Federal Modifications-
Amend: 15 CFR 922.73(b):

(b) ***Marine conservation area.*** Unless prohibited by 50 CFR part 660 (Fisheries off West Coast States), the following activities are prohibited and thus unlawful for any person to conduct or cause to be conducted within the specified marine conservation areas described in appendix C to this subpart, except as specified in paragraphs (b) through (e) of § 922.72:

(b.1). Anacapa Island Marine Conservation Area
(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for pelagic finfish; or

(ii) Commercial and recreational fishing for lobster.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for lobster or pelagic finfish, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.2) Gull Island (Santa Cruz Island) Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.3) Footprint Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.4) Santa Barbara Island Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

Amend: Appendix B to Subpart G of Part 922 (Marine Reserve Boundaries) for 15 CFR 922 B.4, B.5, B.6, B.7, and B.8.

~~B.4. Gull Island (Santa Cruz Island) Marine Reserve~~

~~The Gull Island Marine Reserve (Gull Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–4, and the following textual description.~~

~~The Gull Island boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi~~

~~State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.~~

~~Table B–4—Gull Island (Santa Cruz Island) Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.86195° N~~	~~119.80000″ W~~
~~2~~	~~33.86195° N~~	~~119.88330″ W~~
~~3~~	~~33.92690° N~~	~~119.88330″ W~~
~~4~~	~~33.90700° N~~	~~119.80000″ W~~
~~5~~	~~33.86195° N~~	~~119.80000″ W~~

B.4. Scorpion (Santa Cruz Island) Marine Reserve

The Scorpion Marine Reserve (Scorpion) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–5, and the following textual description.

The Scorpion boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–4—Scorpion (Santa Cruz Island) Marine Reserve

Point	Latitude	Longitude
1	34.15450° N	119.59170″ W
2	34.15450° N	119.54670″ W
3	34.10140° N	119.54670″ W
4	34.10060° N	119.59170″ W
5	34.15450° N	119.59170″ W

~~B.6. Footprint Marine Reserve~~

~~The Footprint Marine Reserve (Footprint) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–6, and the following textual description.~~

~~The Footprint boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward and then southeastward until it intersects the line defined by connecting Point 4 and Point 5 along a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.~~

~~Table B–6—Footprint Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.90198 ° N~~	~~119.43311 ″ W~~
~~2~~	~~33.90198 ° N~~	~~119.51609 ″ W~~
~~3~~	~~33.96120 ° N~~	~~119.51609 ″ W~~
~~4~~	~~33.95710 ° N~~	~~119.43311 ″ W~~
~~5~~	~~33.90198 ° N~~	~~119.43311 ″ W~~

B.5. Anacapa Island Marine Reserve

The Anacapa Island Marine Reserve (Anacapa Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–7, and the following textual description.

The Anacapa Island boundary extends from Point 1 to Point 2 along a straight line. It then extends to the 3 nmi State boundary where a line defined by connecting Point 2 and Pont 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–5—Anacapa Island Marine Reserve

Point	Latitude	Longitude
1	34.08330 ° N	119.41000 ″ W
2	34.08330 ° N	119.35670 ″ W
3	34.06450 ° N	119.35670 ″ W
4	34.06210 ° N	119.41000 ″ W

Point	Latitude	Longitude
5	34.08330 ° N	119.41000 ″ W

~~B.8. Santa Barbara Island Marine Reserve~~

~~The Santa Barbara Island Marine Reserve (Santa Barbara) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–8, and the following textual description.~~

~~The Santa Barbara boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line. The boundary then extends from Point 5 to Point 6 along a straight line.~~

~~Table B–8—Santa Barbara Island Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.36320 ° N~~	~~118.90879 ″ W~~
~~2~~	~~33.36320 ° N~~	~~119.03670 ″ W~~
~~3~~	~~33.41680 ° N~~	~~119.03670 ″ W~~
~~4~~	~~33.47500 ° N~~	~~118.97080 ″ W~~
~~5~~	~~33.47500 ° N~~	~~118.90879 ″ W~~
~~6~~	~~33.36320 ° N~~	~~118.90879 ″ W~~

Amend: Appendix C to Subpart G of Part 922 (Marine Conservation Area ~~Boundary~~ Boundaries) for 15 CFR 922

C.2. Gull Island (Santa Cruz Island) Marine Conservation Area

The Gull Island Marine Conservation Area (Gull Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–4, and the following textual description.

The Gull Island boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–4—Gull Island (Santa Cruz Island) Marine Conservation Area

Point	Latitude	Longitude
1	33.86195 ° N	119.80000 ″ W

Point	Latitude	Longitude
2	33.86195 ° N	119.88330 ″ W
3	33.92690 ° N	119.88330 ″ W
4	33.90700 ° N	119.80000 ″ W
5	33.86195 ° N	119.80000 ″ W

C.3. Footprint Marine Conservation Area

The Footprint Marine Conservation Area (Footprint) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–6, and the following textual description.
The Footprint boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward and then southeastward until it intersects the line defined by connecting Point 4 and Point 5 along a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.
Table B–6—Footprint Marine Conservation Area

Point	Latitude	Longitude
1	33.90198 ° N	119.43311 ″ W
2	33.90198 ° N	119.51609 ″ W
3	33.96120 ° N	119.51609 ″ W
4	33.95710 ° N	119.43311 ″ W
5	33.90198 ° N	119.43311 ″ W

C.4. Santa Barbara Island Marine Conservation Area
The Santa Barbara Island Marine Conservation Area (Santa Barbara) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–8, and the following textual description.
The Santa Barbara boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line. The boundary then extends from Point 5 to Point 6 along a straight line.
Table B–8—Santa Barbara Island Marine Conservation Area

Point	Latitude	Longitude
1	33.36320 ° N	118.90879 ″ W
2	33.36320 ° N	119.03670 ″ W
3	33.41680 ° N	119.03670 ″ W
4	33.47500 ° N	118.97080 ″ W
5	33.47500 ° N	118.90879 ″ W
6	33.36320 ° N	118.90879 ″ W

Links to data sources:

1. CDFW Marine Species Portal: https://marinespecies.wildlife.ca.gov/ for Bluefin Tuna, Swordfish, and Striped Marlin
2. NOAA Species Directory: https://www.fisheries.noaa.gov/species-directory for North Pacific Swordfish and Pacific Bluefin Tuna
3. PIER papers: https://pier.org/resources/publications/ for swordfish migratory movements DOI: 10.1111/fog.12461, and DOI:10.1111/j.1365-2419.2010.00543.x
4. WCPFC stock analysis: https://www.wcpfc.int/current-stock-status-and-advice for Pacific Bluefin Tuna, North Pacific Swordfish, North Pacific Striped Marlin
5. Oceana DSBG Sustainability Article: https://usa.oceana.org/press-releases/new-day-dawns-for-whales-sea-turtles-and-sustainable-swordfish-fishing-off-californias-shores/
6. PEW DSBG Sustainability Article: https://www.pewtrusts.org/en/research-and-analysis/articles/2023/06/22/us-approves-sustainable-way-to-catch-swordfish-off-west-coast
7. MPA regional info: https://californiampas.org/mpa-regions/north-coast-region
8. Channel Islands Network info (NOAA): https://channelislands.noaa.gov/about/maps.html#:~:text=Channel%20Islands%20National%20Marine%20Sanctuary%20protects%201%2C470%20square%20miles%20of,Miguel%2C%20and%20Santa%20Barbara%20islands
9. MPA Master Plan hub: https://wildlife.ca.gov/Conservation/Marine/MPAs/Master-Plan

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:
    - Would give local charter businesses better access to local Northern Channel Island banks, helping business and reducing fuel costs and emissions spent traveling further offshore.
    - Would significantly assist the commercial swordfish industry and total domestic swordfish landings, returning legacy harpoon fishery waters, and allowing for more sustainable, domestic product to be landed by harpoon and DSBG after the phase out of drift nets.

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

    None to my knowledge.

SECTION 3: FGC Staff Only

Date received: **3/14/2025**

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

State of California – Fish and Game Commission
PETITION TO THE CALIFORNIA FISH AND GAME COMMISSION FOR REGULATION CHANGE

Tracking Number: (2023-15MPA)

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: Blake Hermann
   Address:
   Telephone number:
   Email address:

2. **Rulemaking Authority (Required) -** Reference to the statutory or constitutional authority of the Commission to take the action requested:
   -Fish and Game Code (FGC) Division 1, Chapter 2, Sections 200, 205c, 265, and 399
   -Fish and Game Code (FGC) Division 2, Chapter 5, Sections 1590 and 1591
   -Fish and Game Code (FGC) Division 3, Chapter 10.5, Sections 2860 and 2861
   -Fish and Game Code (FGC) Division 6, Chapter 6, Section 6750
   -Public Resource Code (PRC) Division 27, Chapter 7, Sections 36725(a) and 36725(e)

3. **Overview (Required) -** Summarize the proposed changes to regulations:

This petition requests a modification to three Marine Protected Areas (MPAs) off Southern Santa Cruz Island and Santa Barbara Island, known as the Footprint Marine Reserve (The Footprint), Gull Island Marine Reserve (Gull Island), and The Santa Barbara Island Marine Reserve (SBI). The Footprint and Gull Island Reserves are located on the southeast and southwest sides of Santa Cruz Island respectively, and the SBI Reserve is located on the south-east corner of Santa Barbara Island.

This petition requests, for the reasons stated in the accompanying sections, that The Footprint, Gull Island, and SBI Reserves be modified and partially opened and converted into limited take conservation areas with implementation of one the following options (listed from the most to least allowances):

Option 1: The least restrictive option, with some existing precedent SCMAs:
- The recreational take of pelagic finfish* is allowed.
- The commercial take of pelagic finfish* by hook-and-line, and swordfish by harpoon are allowed.
- Deep-Set-Buoy-Gear (DSBG) is allowed in the federal portions of the proposed MPAs. **

Option 2: Elevated protections in species selectivity **(preferred option)**:
- The recreational take of Highly Migratory Species (HMS)* is allowed.
- The commercial take of Highly Migratory Species (HMS)* by hook-and-line, and swordfish by harpoon is allowed.
- The possession of Coastal Pelagic Species (CPS) is allowed.
- Deep-Set-Buoy-Gear (DSBG) is allowed in the federal portions of the proposed MPAs. **

Option 3: Option 1 with only allowance of "surface fishing methods:" ***
- The recreational take of pelagic finfish* is allowed via surface fishing methods.
- The commercial take of pelagic finfish* by hook-and-line via surface fishing methods, and swordfish by harpoon are allowed.

Option 4: Option 2 with only allowance of "surface fishing methods:"
- The recreational take of Highly Migratory Species (HMS)* is allowed via surface fishing methods.
- The commercial take of Highly Migratory Species (HMS)* by hook-and-line via surface fishing methods, and swordfish by harpoon are allowed.
- The possession of Coastal Pelagic Species (CPS) is allowed.

Each of the above options **may** also include a reduced in size, more selective, limited-take or no-take zone within the Gull Island and SBI zones. However, as discussed later, these areas are only needed if Options 1 or 3 are selected (See Attached: Full Analysis Document 1).

*List of State HMS, *CPS, and Pelagic finfish* per Title 14 CA § 1.49, *1.39, and 632(3)*:

-Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius).

-Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens).

-Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

Deep-Set-Buoy-Gear (DSBG), if allowed, would **only be allowed beyond the 3nm line, outside of state waters, as is currently fished. Barring any future changes or exempted fishing permits (EFPs).

***See Full Analysis Document attachment (Document 1) for detailed description.

4. **Rationale (Required) -** Describe the problem and the reason(s) for the proposed change:

The Problem:

Initially established in 2003 and federally expanded in 2006, the Channel Islands MPA network containing The Footprint, Gull Island, and SBI Reserves was the first network of its kind in California history. This island network later expanded into the statewide MPA network during coastal implementation phases from 2007-2012. The problem created by these first MPAs was the unintentional protection of seasonal pelagic and highly migratory species that migrate into Southern California during the summer months.

The allowance of limited pelagic or highly migratory take in these areas falls in line with the adaptive management measures set forth in the Decadal Management Review (DMR) and reinforced by the Marine Resource Council's (MRC) near-term recommendations. The proposed changes also fall in line with the MPA Master Plan and align with FGC comments on previous change request petitions.

While maintaining the original intentions for the creation of the MPAs, the proposed changes will have minimal impacts on the ecosystem due to the selective nature of the gear being recommended and highly mobile species it would allow for.

Summary of the reasons for change:

This petition aims to prove this proposal is justified by showing the following*:

- Limited take of pelagic finfish or HMS does not significantly affect or interfere with the species and features the MPAs aim to protect
- The proposed changes provide better equality of MPA policy across the state
- The 20 years of data from these and other MPAs support the proposed changes
- The proposed changes are in line with MPA decadal management review (DMR) comprehensive recommendations and the near-term priority recommendations of the marine resource committee (MRC)
- The proposed changes follow precedent set by the FGC's comments on previously submitted petitions, the current MPA overviews, the 2016 MPA master plan for the southern section, and the original 2002 MPA CEQA for the Channel Islands Network
- The proposed changes exclusively allow for sustainable fishing methods on no at risk populations/species
- The proposed changes support sustainable commercial fisheries the state and NOAA have expressed desire to further expand
- The proposed changes are reasonably enforceable (per discussions with F&G officers)
- The proposed changes have mass public support from the public, fishery groups, non-fishery groups, and conservation organizations

If implemented the resulting changes may have the following effects:

- The Channel Islands MPA network would be updated to allow for a more equitable 60/40 no-take to limited take closure ratio, which would be in line with the state's ratio
- Would provide new fishing opportunities to sustainable recreational and commercial fisheries while producing minimal impacts to the intended protected structures and species

- Provide new research opportunities for observing previous no-take zones under new allowance of pelagic or HMS limited-take
- Help grow local business and further develop the local and state economy

*Further detailed explanations, analysis, and figures are included in Document 1, and the remaining documentation in the "Supporting Documentation" section.

SECTION II: Optional Information

5. **Date of Petition:** Submitted-11/22/2023

6. **Category of Proposed Change**
   ☒ Sport Fishing
   ☒ Commercial Fishing
   ☐ Hunting
   ☐ Other, please specify: Click here to enter text.

7. **The proposal is to:** (*To determine section number(s), see current year regulation booklet or https://govt.westlaw.com/calregs*)
   ☒ Amend Title 14 Section(s): Division 1, Subdivision 2, Chapter 11, § 632
   ☐ Add New Title 14 Section(s):.
   ☐ Repeal Title 14 Section(s):
   *See Document 20 for State and Federal Code modifications example

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: Due to the change regarding modifying existing MPAs that cover both State and Federal waters, the federal bodies (NOAA, NMS, and PFMC) must mirror the above changes in their portions of the MPAs to allow for reasonable enforcement of these areas. Due to the lack of precedent, this being the first time the FGC is allowing petitions for individual or groups of MPAs to be modified, new channels need to be opened in order to facilitate such changes. A reasonable amount of time for all parties (state, federal, and public) to review and confirm the reasonings and data provided is required. This petition simply requests this change be made as soon as is practical.

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

Document 1: Complete, in-depth analysis of the prescribed changes and key points including weighing out the aforementioned change options, scientific basis, and stock assessment analysis.

Why Change These MPAs?

California's MPA network has provided valuable data for researchers allowing for observations of small-scale ecosystems in their raw form with no human intervention. That being said, all research focuses on the local non-pelagic species in these areas. The reasonings for this will be discussed later in depth but is a result of the massive area pelagic populations cover making their net presence the same everywhere. It is for this reason that if changes are made, the local non-pelagic species will remain unaffected, and still be protected under the proposed changes.

This petition aims to prove that specific limited-take allowances will not significantly interfere with the populations the MPAs aim to protect. This petition requests 3 current MPAs be modified to limited take in order to allow for sufficient numbers of no-take zones to still remain in the Channel Islands Network for research and public non-consumptive use (approximately 60% of the island network will remain no-take zones).

With the proposed change, there lies immense research opportunity in filling gaps in our knowledge. Never has a no-take MPA been converted into a limited-take zone. If there are factors that limited-take of pelagic or HMS does have on the local, non-pelagic populations (currently none are known), this change would allow for a whole new branch of research to take place; observing converted no-take zones after 20 years of historical data.

This petition acknowledges the need for no-take MPAs around the Channel Islands to act as a baseline to research as well as areas for the public to view undisturbed waters, and if implemented approximately 60% of the island network would remain no-take. This would mirror the state average for no-take zones. This petition also acknowledges there is no reason to request for a limited take zone in an area far offshore or often locked by foul weather that would theoretically only be fished a handful of times a year. These areas were selected for the reason that they offer sufficient new opportunities to the fishing community and researchers if the no-take areas are converted into limited-take areas.

A unique fact of these three MPAs, and other MPAs in the Channel Islands network is their expansion beyond state waters, something we see nowhere else in the state. All three of these MPAs are part of this subset of state/federal MPAs, extending 6nm from the islands compared to the traditional 3nm a normal MPA would cover. This means for this specific petition, if changes are made, both State and Federal changes should be mirrored to allow for reasonable enforcement and streamlining of regulations. The Commission and CDFW would likely need to partner with NOAA and the Channel Islands National Marine Sanctuary (CINMS) to make these dual zone changes within each MPA. Therefore, this petition will also be addressing NOAA/CINMS and federal fisheries in addition to the Commission and state, so all agencies are aware of the changes being requested and the supporting factors for this change.

The First California MPAs:

The Channel Islands MPA network was the first set of MPAs in California history. Established in 2003, the state closures were expanded in 2006 into federal waters, completing the Channel Islands MPA network. The first state MPAs off the central coast were then implemented one year later, in 2007, beginning the statewide network. The Channel Islands MPAs had no accompanying southern section coastal MPAs until the southern section's implementation in 2012, which also marked the completion year of the state MPA network and nearly a decade of existence for the Channel Islands MPAs.

Being the first, the Channel Islands Network acted as a baseline, moving the state into previously unexplored territory, that today has grown into the current network. That being said, these first MPA implementations were not perfect. We have learned a lot since their creation, from better understandings of both non-pelagic and pelagic species to new closures ideas that followed in the

four coastal MPA regions. Now that we have had more than 20 years to observe how this island network acts, it is time to make fine-tuned adjustments in order to modernize the Channel Island network to better mirror the remaining state network and the latest research.

MPA Intentions - Focus on Local Non-Pelagic Species:

Being the first set of MPAs and covering both state and federal waters, the state partnered with the Channel Islands National Marine Sanctuary (CINMS) and NOAA to develop a plan in order to determine how the Channel Islands MPA network would look. In the end, a two-part CEQA was developed that laid out the MPA plan for the Channel Islands network, in which the broad and specific reasonings for The Footprint, Gull Island, and SBI reserves were discussed *(Docs. 3-5).*

Broadly speaking all three of these Channel Islands MPAs were put into effect either around common invertebrate/fishing grounds or were built off of an existing invertebrate closure (SBI). The CEQA acknowledges that placing MPAs around these zones may have congested fishing efforts elsewhere and may slow fisheries short-term. However long-term, it was the belief that these protected areas would act as a sort of oasis, growing mass populations inside that would expand out as they grow to capacity inside reserves. These populations would then radiate from these areas and would in turn help fisheries over time.

We can see the idea of protecting the local, nearshore species of the Channel Islands very evident in each of the three MPA justifications in the CEQA *(Docs. 3-5)*, the 2016 MPA master plan goals *(Doc. 10)*, and the published MPA overviews *(Docs. 7-9)*.

According to the CEQA, The Footprint was originally established with the primary intention to protect the unique rocky reefs and rebuild the rockfish populations *(Doc. 7)*, The CEQA discussed the depleted groundfish stocks at the time and mentioned how they would benefit the most from the MPA's implementation. The Gull Island and SBI reserves also discuss deep water reefs and rockfish, but focus more on endangered bird nesting grounds, abalone populations, and the more diverse, nearshore species along the islands they border *(Docs. 8 and 9).* The broad implication of the MPAs in the CEQA was the intention that local populations of fish, birds, and mammals inside the MPAs would, "respond to protection within the reserve through increased density, individual size, and reproductive potential," *(Docs. 3 and 4)*.

This logic is something we see echoed today in the modern MPA overviews of the three MPAs and the goals of the MPA Master Plan *(Doc. 10)*. In the MPA overviews under, "Why was this location chosen for a state marine reserve?" we still see reasons such as the protection of canyons, rocky reefs, pinnacles, kelp forests, and rocky nearshore habitats for local non-pelagic species including copper rockfish, sheepshead, cowcod, and bocaccio. However, there is zero mention of any pelagic or HMS in these overviews. This point is further reinforced by the southern section MPA master plan, where under its goals, states its intentions revolve around protecting the ecosystems within the MPAs and help rebuild rare or depleted populations of species that are, "more likely to benefit from MPAs," and, "Protect selected species and the habitats on which they depend while allowing some commercial and/or recreational harvest of migratory, highly mobile, or other species; and other activities," *(Doc. 10)*. All of these protective goals are catered to the local species of non-pelagic fish, while the pelagic goals clearly state that pelagic and HMS should have limited take areas, something that the Channel Island network severely lacks compared to the rest of the state.

Proposed Changes Effect on the Original MPA Intentions:

As mentioned, the original and current goals of these three MPAs revolve around protecting the local, non-pelagic, and nearshore species within them. The idea of a radiating effect helping fisheries around MPAs does indeed hold merit for local populations of non-pelagic species. Species like groundfish that could in theory live, feed, and spawn all within one MPA are a prime example of

this working as intended today. A groundfish that may have lived its entire lifecycle inside of a protected area, will only affect that local protected area if that individual was taken. This is why if implemented, the changes would still protect all invertebrates and non-pelagic species, such as rockfish, leaving the original science backed protections, and MPA intentions, in effect.

In regard to these intentions for pelagic or HMS, limited pelagic or HMS take would not noticeably affect any of the pelagic or HMS populations within our waters. This is the case since pelagic and HMS are either highly mobile or seasonal migrators, moving with currents rather than remaining on structure or in a small MPA zone. It is one thing if an entire or significant population of a species live inside a protected area, but for species that live and move over a vast area, these MPAs are negligible in helping their population. Species that live and feed over massive areas of ocean, and spawn hundreds of miles away from the network are intrinsically less affected by a small area they may or may not pass through each year. Unlike the non-pelagic species covered in the CEQA, Master Plan, and modern overviews, pelagic species' population densities, individual sizes, and reproductive potentials are not meaningfully affected by these MPAs. Populations would essentially remain as affected by human impacts whether this proposal goes into effect or not due to the protected areas covering so little of the area they live in. This is something that was actually touched on in the CEQA, where it is stated, "No-take areas, so long as their size is large relative to the **movement** of the species, will lead to increased (species) abundance," *(Doc. 6)*. Essentially, due to pelagics and HMS covering so much area throughout their travels, the impact on a pelagic or highly migratory species being protected inside the existing MPAs is near zero. Therefore, there is no scientific basis to leave protections for these species in effect within these three MPAs.

A prime example is the swordfish, one of the three primary species that would be reasonably targeted inside the MPAs if partially opened. Satellite tag data from the Pfleger Institute of Environmental Research (PIER) *(Doc. 15)* shows tagged swordfish off southern California traveling from the tag location to as far south as Cabo (900 nm), or nearly as far west as Hawaii (1900 nm) to spawn in the winter/spring. They then migrate back to Southern California one year later in the summer to feed. Like the swordfish, other HMS such as marlin or tuna are also examples of species that travel massive distances every year during their migrations. These species cover so much water that the net environmental impact from small areas like these MPAs is near zero. It is for this reason the petition requests that pelagic or highly migratory species are able to be targeted inside of these three areas.

Following MPA Reports, The Need for Adaptive Management:

In January 2023 the DMR of the State's MPA network was published and contained comprehensive recommendations including the following considerations:

- "Allow take of migratory and pelagic species in MPAs that currently do not allow it" and
- "Return MPA fishing opportunities, especially in legacy fishing areas that were previously open to fishing." (*Doc. 12*)

The Footprint, Gull Island, and SBI Reserves fall under legacy pelagic fishing areas, being once completely open. In alignment with the DMR, these legacy areas can be justifiably re-opened to the limited take of pelagic or HMS per the recommendations.

This change is also supported by the recommendation of the Marine Resource Committee (MRC), as outlined in the networks near-term priorities from the DMR. Stating we must, "Apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network and Management Program." We have had ample time to observe these MPAs over their two-decade existence, now that we better understand the low impacts pelagic and HMS have on the network, we can justifiably adaptively manage these MPAs, opening them to limited take. In addition

to the DMR and MRC recommendations the 2016 MPA master plan directly called for limited take areas of pelagic or HMS. Due to these three MPAs being the among the oldest modern MPAs, existing since 2003, it is possible the Master Plan considerations from 2016 were not as refined in 2003. This is something we can now remedy, by modifying these MPAs to modern network outlooks.

In addition to adaptive management measures there also exists a pre-DMR precedent from the FGC stating that the MPA network is not designed for pelagic or HMS. In 2020 the FGC denied a petition calling for creating a sanctuary/MPA for Great White Sharks near Carpentaria on the grounds that MPAs are intended, "[…] not (to protect) individual species, **especially highly mobile, pelagic species**," *(Doc. 11)*. Following the FGC's reason for rejection, this argument can be applied to support the case for the allowance of pelagic or HMS take within the listed reserves, because these species, per their pelagic/highly migratory designation, fall into this category.

Pursuing Equitable Policy Through Modernized SMCAs:

The MPA Network was founded on four key pillars with the innovative idea that these pillars would allow for the adaptive management of the system. One of these pillars is policy and permitting which calls for consistent policy across the network to allow for fair network governance.

After the Channel Islands MPAs were established, the remaining network followed. Comparing the Channel Islands network to the remaining state network we see large shifts toward the partial-take state marine conservation areas (SMCAs) and less overall water coverage.

The Channel Islands network of MPAs covers 21% (318 mi^2) of the total sanctuary waters. Compared to the 16% of state waters currently protected under the network, this means there is a 31% increase in protected areas around the Channel Islands than the rest of the state.

Not only is there an increased area of closures (by percentage) within the Channel Islands network, but also, significantly less relative area open to limited-take. Of the 13 various closures around the island network all but 2 are no-take sections. This only accounts for only 11.43 square miles of water of the 318 square mile closure area, or 3.59% of the sanctuary's closures. By comparison, the state network contains about 40% limited take areas. This is a wide discrepancy between the Channel Islands network and the state network (Over 10 times the relative area around the Channel Islands is no take compared to the rest of the state). If implemented, the percent area of limited take in the Channel Islands Network would roughly mirror the State's 40% limited take figure, bringing more equity to the local region. The raw figures are shown in the table below.

Table 1: Comparison of MPA (no-take) and SMCA (limited take) of the Channel Islands MPAs vs the Entire State MPA Network

	Channel Islands MPA Network (State and Federal Waters)	State MPA Network
% of Waters Protected (no-take and limited take)	21% (~318 mi^2)	16%
% of network that is No-Take	96.41% (~306.58 mi^2)	60%
% of network that is limited take	3.59% (~11.41 mi^2)	40%
% of network that would be limited take if changes implemented*	41.17% (~130.93 mi^2)	<40%

*This assumes the optional "nearshore" closures are not implemented and includes the Channel Islands network in the state network figures.

The goal of these changes is to allow for enough reasonable take of pelagic or HMS at comparable levels of opportunity zones to the rest of the MPA network (~40% partial take allowance). If implemented, the Channel Islands network would still have elevated protected area rates, 21% compared to the state average of 16%, but would provide a better ratio of limited take areas.

Current examples of limited take areas outside of the island network in Southern California include SMCAs such as the Pt. Dume, Abalone Cove, Blue Cavern, and Farnsworth SMCAs *(Doc. 17)*, which allow for some form of pelagic finfish take. Other statewide examples of limited take SMCAs outside Southern California cater to pelagic finfish and salmon, technically not a pelagic finfish by biological definition, but a species that still covers mass distances every year. This petition simply requests that we adapt too and update the Channel Islands network to the same standards we see in the rest of California.

Enforcement Analysis:

On the surface, the opening of limited take for pelagic or HMS in these current no-take MPAs could create additional enforcement issues for F&G Wardens covering these areas. However, upon talking to the warden office and local wildlife officers it was determined this was not the case. It is the intention of this petition that the changes made would be enforced similarly to how current pelagic allowed SMCA's are enforced. For the local Ventura agency, enforcement would be identical to how officers enforce the Anacapa Island SMCA.

Discussions with the enforcement agency have indicated that there are currently no issues with enforcement in the current pelagic allowed SMCAs. It is their standpoint that the current enforcement regulations are clear and allow officers to make decisions swiftly and appropriately. The current regulation that outlines enforcement of the SMCAs is under California Code of Regulations Title 14 Section 632(a)(1)(C) *(Doc. 18)*. To summarize the code, take or possession of species except specific individuals or groups listed is prohibited. Meaning, under the proposed regulations, the take and possession of pelagic or HMS would be allowed within the conservation area, but the take and possession of non-pelagic or non-HMS species, like groundfish, would be not allowed. There is an added exception that only possession of coastal pelagic species (CPS) would be allowed if an HMS specific option is selected (it is preferred one is). The reasoning for this addition is the allowance for such HMS targeting vessels to possess baitfish that is commonly used to target such species. Due to the clear-cut boundaries of enforcement regulations, and the input from F&G wardens, it was determined that the additional enforcement required by these changes is both minimal and overlaps with current pelagic allowed SMCAs they currently patrol and enforce.

Mass Public Support:

The origins of the pelagic allowed zones go back to the original implementation of the Channel Islands MPA network which includes 2 areas for pelagic take. However, the waters these two zones cover are located on the northern side of Anacapa and Santa Cruz islands, areas where very little pelagic/HMS fishing takes place. HMS fishing method trial maps for DSBG and deep drop show a clear picture of the primary pelagic/HMS grounds in southern California *(Doc. 16)*. The maps clearly display most pelagic and HMS fishing occurs on the southern sides of the four northern islands. Almost no fishing efforts are made in the two northern zones. Primarily, most pelagic and HMS targeting fishing around the Channel Islands occurs 2-12 miles south of the northern islands, down the entire 4 island chain. All three of the requested MPA lie in these areas.

Fisheries that actively target or have targeted pelagic or HMS off the northern Channel Islands have wanted these types of changes since the implementation of the network and have commented both in the past and present about the desire to allow for more pelagic or HMS limited take.

Comments from 2002 in the CEQA and from 2023 DMR show this desire. However, back in 2002, we did not know nearly as much about the pelagic or HMS migrations and what impacts allowing a small fishery inside these areas could be. Today this is simply not the case. We now know that this change, if implemented, will further streamline current regulations concerning pelagic or HMS, while having a net minimal impact on the local ecosystems inside these MPAs. This petition has the official backing and support of several fishery businesses, groups, and individuals, *Doc. 2 for list and letter*, and also includes a publicly signable petition containing over 880 signatures at the time of submittal.

The 4 Options Breakdown including Stock and Fishery Analysis:

This section will discuss the impact the allowed fisheries may have on the species that would primarily be targeted, the pros and cons of the four options, and the possible nearshore closure(s). The discussions on the four options and optional no take zones are meant to provide the thoughts and opinions of pelagic and HMS fishery groups and individuals for the Commission to better understand their viewpoints.

-Pelagic and HMS Stock and Fishery Analysis: Out of all of the HMS, Bluefin tuna migrate the furthest in terms of net geographical distance traveled in their lifetime, with individuals who reach maturity traveling from the coast of California across the pacific to Japan, moving up to 70 miles per day during said migration. Billfish (Swordfish or Marlin) travel in two more distinct groups, rotating from California either toward the mid-pacific and Hawaii or off the coast of Mexico, moving up to 35 miles per day according to tag data. All these species and the other pelagic and HMS affected by this change follow migrations similar these, coming into waters off of California in the early summer (June-July), and mostly departing by early winter (November-December). This migration timeline and fishing attempts toward HMS in California are directly related, meaning most, if not all, fishing will be during these 5-7 months, leaving waters relatively untouched the remaining months of each year.

The fishery impact from these changes would be minimal to the overall take of HMS and their stocks. It is the primary intention of this petition that the species primarily targeted inside of these areas (if HMS or pelagic fishing is allowed), would be swordfish, bluefin tuna, and striped marlin. While some other attempts toward more exotic species such as yellowfin or dorado may occur, it would be rarely available.

Fishery efforts in these MPAs also needs to be considered. Pelagic and HMS do not remain in small areas, rather moving with the water and currents. HMS fishery efforts would not be concentrated inside of these proposed limited-take areas, but rather flow through them as the water these species follow flows through these areas. The fishery would cover the same grounds it does today, with the changes allowing targeting though these areas compared to having to work around them as these species move through them. The two most targeted species in these areas that would be retained are bluefin tuna and swordfish. Striped marlin would likely be targeted the most in terms of fishing effort, but almost all marlin captures are recreational and result in a release.

According to NOAA the bluefin tuna population is not subject to overfishing and stock assessments show the population has “significantly increased,” *(Doc. 13)*. If any of the listed options is accepted, all recreational methods of take would be available for bluefin tuna. A majority of this would be hook-and-line, with spearfishing taking up the remaining numbers. Commercially, only hook-and-line bluefin would be permitted as spearfishing is not a commercial option. A concern that was raised was the allowance of commercial hook-and-line bluefin take within these areas. Some groups believed allowing commercial take would prove to have too much of an impact on the stock. However, observing NOAA commercial landing data we see that California’s commercial fishermen only account for 2% of the yearly pacific bluefin that is commercially harvested, meaning the local commercial fishery has a minimal impact on the stock *(Doc. 13)*.

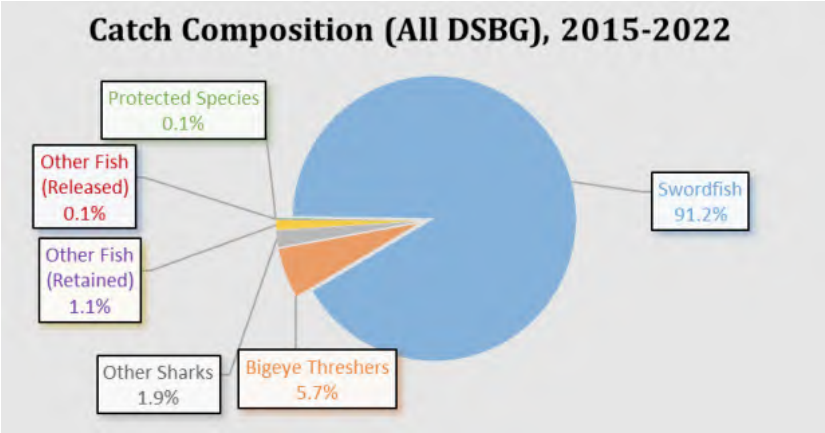
The stock numbers and movements are similar for swordfish as well. NOAA lists the pacific swordfish stock is at safe levels and not subject to overfishing *(Doc. 14)*. The total local impact by California vessels is listed as minimal with a "significant majority" of swordfish landed by Hawaii based longline vessels. Commercially, with the phasing out of the drift gillnet (DGN), both the state and federal agencies have made it readily apparent they are trying to find new ways to better target and expand commercial swordfish in California. All three of these current MPAs lie in the middle of some of the only reliably fishable swordfish grounds in the Channel Islands. All sit downwind of islands that block the wind and provide fair weather for fishing to occur on days fishing elsewhere is not possible under current allowed commercial methods (Harpoon and DSBG). This is especially the case for harpoon swordfish, a fishery that requires flat-calm water. The allowance for partial take of swordfish inside these regions would allow for a larger calm area to be covered and fished for migrating swordfish.

Unlike bluefin, depending on the accepted option, certain allowances for swordfish take would be made, but some <u>may</u> still be restricted. Options 1 and 2, if either are accepted, would allow all recreational methods for take of swordfish. Historically, this has almost exclusively been surface baiting basking swordfish, a fishery with zero deep water impacts, and has near zero impacts on anything in that area except for the swordfish it targets. Recently however, anglers have begun to mirror commercial methods, and have begun placing baited hooks at deeper depths (~900-1000 ft) for swordfish. Under current regulation, this method of "deep dropping" has no difference/distinction between hook-and-line fishing and would therefore be allowed.

For commercial methods of take, harpoon swordfish would be allowed under any accepted option. This globally recognized sustainable fishery with zero bycatch, is a fishery perfectly suited to have as little impact as possible on the local, non-pelagic ecosystems when a fish is taken. However, like the recreational hook-and-line case, the allowance of commercial hook-and-line for pelagic or HMS inside these regions would allow commercial deep drop of swordfish.

Along with deep drop methods, and in the spirit of fairness to the commercial fleets, Options 1 and 2 would also allow the use of standard-deep-set-buoy-gear (DSBG) <u>in the federal waters only</u> of the proposed limited-take areas (as it is currently primarily fished). DSBG is currently a federally exclusive fishery, with the exception of one exempted fishing permit (EFP). DSBG is a method consisting of ten separate flags and buoys with one line and one hook on each flag/buoy and is a modern sustainable fishery for swordfish. Due to the nature of these areas overlapping federal waters containing a harpoon allowance (state and federal), the argument for federal authorization of DSBG in these areas is being requested if hook-and-line deep drop is allowed. As previously mentioned, this change, along with other federal water changes would assumably be made by NOAA and the CINMS working with the state.

These methods of targeting swordfish at depth do have more impact than recreational surface baiting or commercial harpooning. However, the impact of these methods and their bycatch is minimal on non-HMS or pelagic species. This type of fishing has been praised by conservation organizations like Oceana and PEW for its high selectivity and extremely low bycatch (*Links 5/6*). There is also over 10 years of historical catch data for DSBG, the method that hook-and-line deep drop branched from, and 7 years of data from NOAA detailed in the chart below.



Looking at the data we can see that from 2015-2022, DSBG captured 91.2% swordfish, and a 96.9% mix of swordfish and thresher shark (another HMS). Of the "other sharks" and "other fish" most of these species were a mix of other pelagics (i.e., mako sharks, opah, and escolar). This means that nearly 99.8% of all species caught with DSBG are HMS. Almost no non-pelagic or non-HMS species have been landed under this type of fishery, due to its extreme selectivity. In the small number of cases where non-HMS species were hooked, the active tending of this gear allows for most bycatch to be released alive and well. Since deep drop methods mirror DSBG it is reasonable to assume their catch rates would mirror DSBG rates as well. It is for this reason that deep drop and federal authorization of DSBG for swordfish were listed allowances under Options 1 and 2, since they produce the lowest bycatch numbers, but produce the higher success rates for swordfish catch compared to harpoon or surface baiting.

If Options 1 and 2 are rejected but Option 3 or 4 are accepted, all HMS or pelagic targeting methods would still be allowed except those going deep to primarily target swordfish. These options call for the use of only "surface fishing methods," a term used to describe all non-deep drop methods. This includes methods such as trolling, live bait casting, lure casting, live bait drifting (on the surface), and all other methods anglers or commercial fishermen use besides deep dropping or DSBG.

-<u>The 4 Options and Their Reasonings:</u> Each of the four options is designed to have a minimal impact on the protected area's local ecosystem but vary in both allowed species and allowed gear types. There are really two sets of choices, when we break down the 4 options. The first choice allows either pelagic finfish take and possession, or HMS take and possession with possession of coastal pelagic species (CPS). The logic behind allowing pelagic finfish is primarily the precedent already set on other SMCAs. Pelagic finfish cover the 3 species that would primarily be targeted (swordfish, bluefin tuna, and striped marlin), cover other pelagic species that would occasionally be targeted, and have existing SMCAs elsewhere that already allow for this subset of species. However, this list also covers more species than the HMS list, and as will be discussed, these extra species may pose undesirable issues if limited-take implementations are not made properly. The logic behind allowing HMS take and possession, and CPS possession is that the three targeted species also fall under this more selective classification of species. Meaning there would be a more selective list of species allowed to be taken, thus less overall impact on what could be done inside these areas. Allowing only HMS limited take would also avoid the possible pelagic finfish issues discussed below. The reasoning for the CPS allowance is it would allow common baitfish used to fish HMS to still be retained inside of these areas.

The second choice is the allowance of all hook-and-line methods, including deep drop, and DSBG or only allowing "surface fishing methods." The logic with allowing deep drop and federal DSBG allowance is the data shows that these methods are extremely selective and prove effective in targeting primarily swordfish at depth. This choice would allow for more area of opportunity to selectively target swordfish, something the State, NOAA, and PFMC has made very apparent they want to help accomplish, especially commercially with the end of the gillnet dropping landings of California swordfish. The logic with allowing "surface fishing methods" is an attempt at regulating out the deep dropping methods inside of these zones if the State deems them too impactful to allow. If

this choice is made, it would make the limited-take areas more selective to swordfish methods only, leaving surface baiting recreationally and harpooning commercially as the only allowed methods to target swordfish. If this option is selected, the state would have to clearly define “deep dropping” (to not allow it) or define “surface fishing methods” (to only allow those).

In addition to the four main options, there exists a final choice of adding a nearshore closure to the Gull Island and SBI zones with more selective or no fishing methods being allowed. The selected limited take option would then be implemented outside of this boundary throughout the remaining “offshore” area. The logic behind this choice has several factors, some of which are the existence of a nearshore/offshore pair in the Farnsworth and Point Buchon SMCAs, and the desire to continue having stricter limited-take or no-take regions closer to the more diverse shorelines. These nearshore regions rarely contain any species this petition intends on anglers targeting, meaning whether or not a nearshore zone is implemented, areas this close to the respective islands would have such a low fishery presence that they would effectively remain untouched, with one key exception.

If an option allowing the hook-and-line take of pelagic finfish is made it is recommended that the nearshore region be implemented. This is due to the fact that limited-take of pelagic finfish by hook-and-line would allow certain game fish species to be targeted in the local, nearshore ecosystems on fishing beds. The intent of this petition is to protect from this type of fishing allowance, intending limited take allowance for these regions to be open water fishing of pelagic or highly migratory species during their movements. This possibility of nearshore bed fishing is only the case for two species on the pelagic finfish list, yellowtail and barracudas. These are species that if pelagic finfish were allowed with no nearshore zone implemented, would definitely be targeted within the nearshore areas of the SBI and Gull Island closures. Again, it is the intention of this petition to only allow for offshore take of pelagic or highly migratory species, primarily billfish and tuna. Allowing pelagic finfish with no nearshore region that accounts for bed fishing of pelagic species such as yellowtail may interfere with the local ecosystem we still aim to protect. If the below listed coordinates are the border for the nearshore regions (table 2), the water outside of these areas at Gull Island and SBI is reasonably deep enough to ensure little to no effort would be made to target these species and would yield almost zero results.

Table 2: Proposed Coordinates and options for the Nearshore limited or no take areas for Gull Island and Santa Barbara Island

Gull Island Nearshore MPA	Santa Barbara Island Nearshore MPA
33° 58.000’ N. lat. 119° 53.000’ W. long, and 33° 55.800’ N. lat. 119° 48.000’ W. long Regulation within nearshore area: Recreational and commercial take of (pelagic finfish or HMS, depending on the state’s choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred) Or A no-take region (not preferred)	The 1nm boundary of SBI within the current MPA Regulation within nearshore area: Recreational and commercial take of (pelagic finfish or HMS, depending on the state’s choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred) Or A no-take region (not preferred)

The listed coordinates for the nearshore closures are only the listed coordinates for the dividing line between the proposed nearshore area and the offshore limited take SMCA and FMCA. The collective closure borders of the nearshore and offshore areas would be the same area as the current MPAs. If these are placed in effect along with the selected option applied outside, these nearshore regions would cover sufficient area to prevent nearshore bed-fishing efforts. While possible changes to these borders may be made, it is the fisheries' belief they are sufficient in preventing what would otherwise be a problem if an unrestricted pelagic finfish option is accepted. Further consultations with active fishery members should be made if these borders are desired to be modified. The preference for stricter limited-take rather than no-take is simply that these areas would contain so little presence of these species, that they would effectively be fully protected. During the time that pelagic or HMS do travel through these nearshore areas, fishing opportunities are so infrequent the opportunity to limited take should be allowed due to how minimally they would occur.

The Most Requested Option and Closing Remarks:

It is this petition's preference that in order to avoid the nearshore pelagic finfish risk all together, one of the two HMS allowance options be selected (Options 2 or 4) with the nearshore zone not selected. Option 2 is the preferred selection since this option allows for the most HMS opportunity, recreationally and commercially, while still remaining extremely selective, and leaving a minimal impact on the local, non-pelagic ecosystems. Option 2, with no accompanying nearshore zones would allow for HMS targeting within the entire area. In the unlikely case HMS are present nearshore, they may still be targeted with minimal local impact as they move through an area under the same selective fishing methods allowed elsewhere. The lack of nearshore zones in this case would also allow for easier enforcement of the area by wardens not having to worry about different zones within an area. If a nearshore region is desired, the more selective limited-take option is preferred. This change would still allow for selective enough take of HMS and prevent any bottom fishing activity nearshore.

In terms of the three MPAs, all three MPAs would preferably be converted to limited take areas. Discussions with those involved in the possible affected fisheries revealed a strong preference for The Footprint to be converted to limited take, with Gull Island and SBI having equal amounts of preference to be opened to limited take.

In closing this analysis, special thanks to all the individuals who provided the input and data to make this petition possible. I would especially like to thank the FGC and its staff for their assistance with and the creation of this adaptive management process.

Remaining Supporting Documents and Sources:

Document 2: Supporters letter for the petition. Summarizes the petition, its reasonings, and its intentions. Was sent out to business and individuals that could be impacted by this change or provide scientific input asking for their support of the petition and its rationale (signature list on the letter).

AFTCO
CCA CAL
PIER
Pfleger Institute of Environmental Research
Wild Oceans
BEAR FLAG FISH CO.
BD
BD OUTDOORS.COM
TUNA CLUB
Bight
SPORTFISHING
LEGIT
SPORTFISHING
BLUEWATER GRILL
O&R
CHANNEL COAST MARINE
Chula Seafood
PHOENIX, AZ | SAN DIEGO, CA
CHANNEL ISLANDS SPORTFISHING
CISCOS
CHANNEL ISLANDS HARBOR, CA
Hook's
SportFishing
WILD LOCAL
SEAFOOD CO.
Ocean Pride
SEAROOO
SANTA MONICA SEAFOOD
A PASSION FOR SEAFOOD
SANTA BARBARA FISH MARKET
EXECUTIVE
YACHT AND SHIP BROKERS
34°09.81 - 119°13.57
THE RV PILAR
A B D CO
Seeker
BALBOA ANGLING CLUB
1926
Seal Beach
FISH CO

Dear FGC,

On behalf of the hundreds of thousands of anglers that frequent Southern California, and all of the businesses they support, the following organizations and individuals extend their special support and ask for your approval of this petition. This petition would allow for the limited recreational and commercial take of Pelagic Finfish or Highly Migratory Species (HMS) via select, sustainable fishing methods. The changes would apply to the following Marine Protected Areas (MPAs):

- The Footprint Marine Reserve
- Gull Island Marine Reserve
- The Santa Barbara Island Marine Reserve

This proposed regulation modification aims to return extremely selective take opportunities that the original MPA network implementation unintentionally removed. These regions would become state and federal marine conservation areas (SMCAs/MCAs) but would still provide the original protections to the species and ecosystems each of the MPAs intends to preserve.
The allowance of pelagic or HMS in these areas would provide more equal opportunities to anglers around Southern California targeting fast moving species, like billfish or tuna. Currently, these species cannot be followed into these zones as they move through them, traveling with the currents rather than remain on the structure or in the local ecosystems the MPAs are intended to protect. If accepted, anglers would have the opportunity to follow these species as they constantly flow in and out of these areas.
The push for this change is backed by the California State 2022 MPA Decadal Review, the MRC's near-term objectives, the 2016 MPA Master Plan, and several other state and federal reports/comments. We the fisherman, groups, clubs, and business owners, of California kindly ask for your approval of this petition.

Sincerely,

AFTCO
CCA California
Pfleger Institute of Environmental Research (P.I.E.R.)
Wild Oceans
BD Outdoors
Bear Flag Fish Co.
Bluewater Seafood
Chula Seafood
The Tuna Club
Balboa Angling Club
CISCOS Sportfishing
Hooks Sportfishing
Legit Sportfishing
Erics Tackle Shop
Channel Coast Marine
Executive Yachts
Bight Sportfishing
Bad Company Fishing Adventures
Seal Beach Fish Co.
Wild Local Caught Seafood
Santa Monica Seafood
Ocean Pride Seafood
Santa Barbara Fish Market

Special Individuals: Chugey S, Theresa L, Casey S, Nathen P, Ron H, Sean B, Morgan L, Bill S, Donald K, Christian H, Andrew W, Carl S, Michael M, Thomas C, Wes L, Marc H, Eric H, Bryce H, Ethan H, Steve W, Don G, Ryder D, Fisher D, Jonnah G, Jake K, Brandon H, Patrick O, John J, Bill W, Steve M, Eric H, Sean S, Ryder A, Evan K

And the over 880 members of the public that have signed the public support petition as of submittal (11/22), visible here: https://chng.it/2wy2dHSS6r

Documents 3, 4, and 5: Original founding reasoning for the Footprint, Gull Island, and Santa Barbara Island MPAs respectively, to be created and expanded into federal waters of the marine sanctuary from the Channel Islands CEQA in 2002. There is little to no mention of pelagic or HMS species, with primary objectives for the Footprint MPA being groundfish replenishment, and for Gull Island and SBI MPAs, being either or a mix of abalone, rockfish, or endangered bird populations. Original paper found here: https://nrmsecure.dfg.ca.gov/FileHandler.ashx?DocumentID=151023

Footprint State Marine Reserve

The Footprint SMR is located in open waters in the passage south of Santa Cruz and Anacapa Islands. The Footprint SMR is 28.6 nm^2, **6.4 square nautical miles of which would be within State waters and the rest** ~~entirely~~ within Federal waters. It is described and analyzed here as a part of the entire recommendation, but not the decision before the Fish and Game Commission. The majority of the proposed Footprint SMR is sand or gravel between 90-900 ft. The Footprint includes several submerged rocky features, including pinnacles and submarine canyons that once supported large population of numerous rockfish species. Today, the rockfish populations around the Footprint are severely depleted from intensive recreational and commercial fishing in the region. Although populations are depleted, the habitat supports a variety of species, including bocaccio and cowcod, both recognized as overfished by the PFMC. Fish populations in the vicinity of the Footprint are likely to respond to protection within a reserve through increased density, individual size, and reproductive potential.

Gull Island, Santa Cruz Island State Marine Reserve

The Gull Island SMR is located on the southwest side of Santa Cruz Island. The reserve includes 2.9 nautical miles of shoreline from Morse Point to the point along the shore at 33° 58' N, 119° 48' W. The reserve extends south approximately three nautical miles to the State waters boundary. The Gull Island SMR contains 16.2 square nautical miles. A subsequent Federal waters phase would add 22.1 square nautical miles for a cumulative total of 38.3 square nautical miles.

Historically, Gull Island supported a diverse and abundant marine fauna. Although these populations are reduced, the habitat supports a variety of species. Fish populations in the vicinity of Gull Island are likely to respond to protection within a reserve through increased density, individual size, and reproductive potential. The Gull Island SMR would protect a variety of different habitat types from the nearshore to the continental slope. Sand beach is the predominant shoreline habitat at the border of the Gull Island SMR. Endangered snowy plovers may occur there and the beach supports one of the few populations of pismo clams at the islands. The remaining shoreline is covered with cobble beaches.

Subtidal habitats in the Gull Island SMR are mixed sand and rocky reefs. Red and green algae dominate inshore areas. Gull Island supports an intermittent population of giant kelp, but the kelp populations are reduced. Subtidal habitats support patchy populations of surfgrass. Rocky intertidal and subtidal habitats once supported populations of red, pink, white, and black abalone, but only a small population of red abalone, and very few black abalone have been observed recently. The Gull Island area supports large populations of purple urchins. Rocky subtidal habitats from Gull Island to Laguna Point support populations of spiny lobster. Purple hydrocoral (*Allopora*) is found in deeper rocky reefs around Gull Island.

Shallow rocky habitat extends offshore to Gull Island. Nearshore reefs support populations of various rockfish species. However, rockfish are not as diverse in this region because of physical changes associated with the mixing of warmer waters from the California Counter Current with cooler waters from the California Current. Southern species such as

5-27

California sheephead and wrasses are relatively common in the Gull Island region. The region also supports spawning populations of white seabass and halibut. Thresher and mako sharks are fished in the deeper waters near stronger currents.

Santa Barbara Island State Marine Reserve

Santa Barbara Island SMR is located at the southeast side of Santa Barbara Island. The reserve includes one nautical mile of shoreline from South Point to the eastern point of the

5-22

island. The reserve boundaries extend east and south to the State waters boundary. The Santa Barbara Island SMR contains 13.**2** square nautical miles. A subsequent Federal waters addition would add 46.3 square nautical miles for a cumulative total of 59.**5** square nautical miles.

Santa Barbara Island, Sutil Island, and Shag Rock support major seabird and marine mammal colonies. Santa Barbara Island supports breeding colonies of numerous seabirds, including the endangered California brown pelican, western gull, black oystercatcher, black storm-petrel, Leach's storm-petrel, Brandt's cormorant, pelagic cormorant, Cassin's auklet, pigeon guillemot and Xantus's murrelet. California sea lions haul out on sandy beaches on the southeastern side of Santa Barbara Island. Harbor seals and northern elephant seals occasionally haul out in the same place.

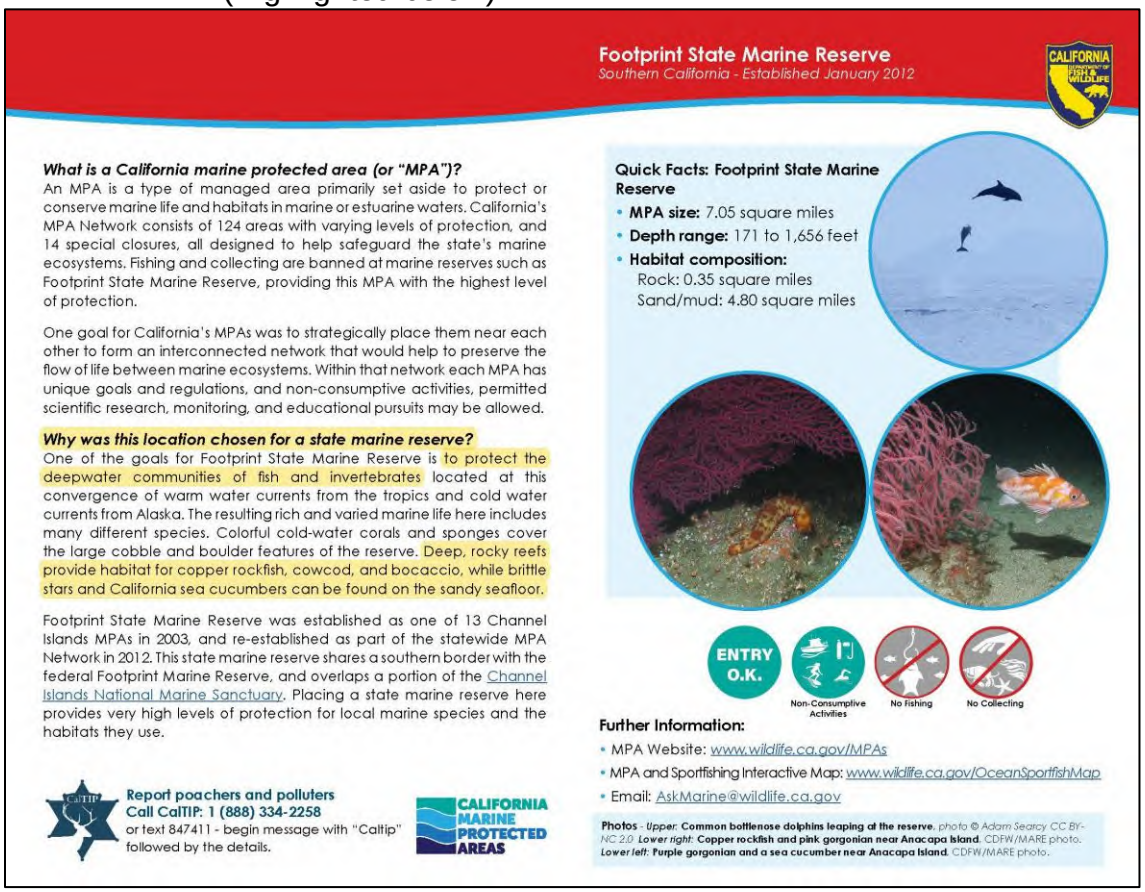
The exposed rocky shoreline along Santa Barbara Island is interspersed with occasional cobble beaches (10-12 m wide) in protected coves. The rocky intertidal habitat descends steeply to patchy reefs in large areas of sand. Patchy populations of surfgrass grow on subtidal rocks (15-20 m). Populations of giant kelp on reefs around Santa Barbara Island have declined relative to historical data. Red and purple sea urchins and brittle stars (*Ophiothrix*) dominate the rocky subtidal habitats around Santa Barbara Island. Spiny lobsters are abundant in rocky subtidal habitats in the vicinity of South Point and large mussel beds can be found in the rocky intertidal habitats on the southeastern side of Santa Barbara Island.

The continental shelf drops to approximately 200 m less than ½ mile from shore, and continues to drop to 400 m within 3 miles of Santa Barbara Island. In the past, populations of white, green, pink, and black abalone inhabited intertidal and subtidal rocky habitats. The reserve includes rocky subtidal habitats, from approximately 25-66 m, that may contribute to the recovery of the endangered white abalone. Sandy subtidal habitats support halibut populations near the northern border of the Santa Barbara Island SMR. California sheephead have been observed near South Point.

Document 6: Original 2002 CEQA: Dr. Ray Hilborn stating the size of an MPA must be large relative to a species' total movement to be actually impactful on their population abundance.

has reached population levels which increase natural mortality rates...@ Likewise, Dr. Ray Hilborn of the University of Washington=s College of Ocean and Fishery Sciences noted in comments on proposals for marine reserves in the Sanctuary that, A...it is almost universally accepted that exploitation reduces population sizes.... No-take areas, so long as their size is large relative to the movement of the species, will lead to increased abundance within the reserve.@

Documents 7, 8, and 9: Current Footprint, Gull Island, and SBI MPA descriptions in "Why the location was chosen…" (Highlighted below)



Footprint State Marine Reserve
Southern California - Established January 2012

What is a California marine protected area (or "MPA")?
An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Footprint State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?
One of the goals for Footprint State Marine Reserve is to protect the deepwater communities of fish and invertebrates located at this convergence of warm water currents from the tropics and cold water currents from Alaska. The resulting rich and varied marine life here includes many different species. Colorful cold-water corals and sponges cover the large cobble and boulder features of the reserve. Deep, rocky reefs provide habitat for copper rockfish, cowcod, and bocaccio, while brittle stars and California sea cucumbers can be found on the sandy seafloor.

Footprint State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. This state marine reserve shares a southern border with the federal Footprint Marine Reserve, and overlaps a portion of the Channel Islands National Marine Sanctuary. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Footprint State Marine Reserve
- **MPA size:** 7.05 square miles
- **Depth range:** 171 to 1,656 feet
- **Habitat composition:**
  Rock: 0.35 square miles
  Sand/mud: 4.80 square miles

ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:
- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Common bottlenose dolphins leaping at the reserve.** photo © Adam Searcy CC BY-NC 2.0. *Lower right:* **Copper rockfish and pink gorgonian near Anacapa Island.** CDFW/MARE photo. *Lower left:* **Purple gorgonian and a sea cucumber near Anacapa Island.** CDFW/MARE photo.

Gull Island State Marine Reserve

Southern California - Established January 2012

What is a California marine protected area (or "MPA")?

An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Gull Island State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?

One of the goals for Gull Island State Marine Reserve is to protect the diverse submarine canyon, rocky reef and pinnacle, kelp forest, and sandy plain habitat found at this location, where warm water currents from the tropics and cold water currents from Alaska converge. These habitats are used by a rich and varied selection of marine fish and invertebrates such as purple hydrocoral, a species not often seen in the Northern Channel Islands. Kelp forests and reefs provide shelter for opaleye, California spiny lobster, and cabezon, while schools of California barracuda and bonito may be seen in deeper, offshore waters.

Gull Island State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. The reserve shares a southern border with the federal Gull Island Marine Reserve, and overlaps a portion of the Channel Islands National Marine Sanctuary and Channel Islands National Park. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Gull Island State Marine Reserve

- **MPA size:** 19.93 square miles
- **Shoreline span:** 3.2 miles
- **Depth range:** 0 to 2,205 feet
- **Habitat composition:**
  Rock: 4.03 square miles
  Sand/mud: 16.55 square miles

ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:

- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Gull Island,** *photo by R.Schwemmer, NOAA/CINMS* *Lower right:* **Purple hydrocoral and sea urchin at Gull Island State Marine Reserve.** *CDFW photo by D. Stein* *Lower left:* **Opaleye in the kelp forest at Gull Island State Marine Reserve,** *CDFW photo by D. Stein*

Santa Barbara Island State Marine Reserve

Southern California - Established January 2012

What is a California marine protected area (or "MPA")?

An MPA is a type of managed area primarily set aside to protect or conserve marine life and habitats in marine or estuarine waters. California's MPA Network consists of 124 areas with varying levels of protection, and 14 special closures, all designed to help safeguard the state's marine ecosystems. Fishing and collecting are banned at marine reserves such as Santa Barbara Island State Marine Reserve, providing this MPA with the highest level of protection.

One goal for California's MPAs was to strategically place them near each other to form an interconnected network that would help to preserve the flow of life between marine ecosystems. Within that network each MPA has unique goals and regulations, and non-consumptive activities, permitted scientific research, monitoring, and educational pursuits may be allowed.

Why was this location chosen for a state marine reserve?

One of the goals for Santa Barbara Island State Marine Reserve is to protect the sandy seafloor, surfgrass, kelp forest, and rocky nearshore habitat found there. Sea urchins, California mussels, and acorn barnacles thrive along the island's rocky coastline. Giant sea bass, California sheephead, and Pacific angel sharks hunt and seek shelter in the island's kelp forests and eelgrass beds, while California halibut and other flatfish rest in the sandy sediments. Santa Barbara Island is also home to a large breeding colony of Scripps's murrelet, a seabird on California's threatened species list, and fourteen other species of bird.

Santa Barbara Island State Marine Reserve was established as one of 13 Channel Islands MPAs in 2003, and re-established as part of the statewide MPA Network in 2012. This state marine reserve shares a southeastern border with the federal Santa Barbara Island Marine Reserve. The reserve overlaps part of the Channel Islands National Park and Channel Islands National Marine Sanctuary. Placing a state marine reserve here provides very high levels of protection for local marine species and the habitats they use.

Report poachers and polluters
Call CalTIP: 1 (888) 334-2258
or text 847411 - begin message with "Caltip" followed by the details.

CALIFORNIA MARINE PROTECTED AREAS

Quick Facts: Santa Barbara Island State Marine Reserve

- **MPA size:** 12.77 square miles
- **Shoreline span:** 0.8 miles
- **Depth range:** 0 to 1,655 feet
- **Habitat composition:**
  Rock: 0.74 square miles
  Sand/mud: 2.43 square miles

ENTRY O.K. | Non-Consumptive Activities | No Fishing | No Collecting

Further Information:

- MPA Website: www.wildlife.ca.gov/MPAs
- MPA and Sportfishing Interactive Map: www.wildlife.ca.gov/OceanSportfishMap
- Email: AskMarine@wildlife.ca.gov

Photos - *Upper:* **Aerial view of Santa Barbara Island,** *photo © Jesse Hodge CC BY-NC-ND 2.0.* *Lower right:* **Pacific angel shark at Santa Barbara Island State Marine Reserve.** *CDFW/MARE photo.* *Lower left:* **Pink gorgonian at Santa Barbara Island State Marine Reserve.** *CDFW/MARE photo.*

Document 10: MPA Master plan goal for the southern section, that calls for the protections of at-risk local species while allowing for limited take of pelagic or HMS.

Goal 2. To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted.

1. Help protect or rebuild populations of rare, threatened, endangered, depressed, depleted, or overfished species, and the habitats and ecosystem functions upon which they rely.[14]
2. Sustain or increase reproduction by species likely to benefit from MPAs, with emphasis on those species identified as more likely to benefit from MPAs, and promote retention of large, mature individuals.[15]
3. Sustain or increase reproduction by species likely to benefit from MPAs with emphasis on those species identified as more likely to benefit from MPAs through protection of breeding, spawning, foraging, rearing or nursery areas or other areas where species congregate.
4. Protect selected species and the habitats on which they depend while allowing some commercial and/or recreational harvest of migratory, highly mobile, or other species; and other activities.

Document 11: Denied petition for White Shark MPA on grounds MPAs are **especially not focused** on pelagic or HMS (Highlighted below)

Appendix G: Decadal Management Review Supplemental Tables

CALIFORNIA MARINE PROTECTED AREAS

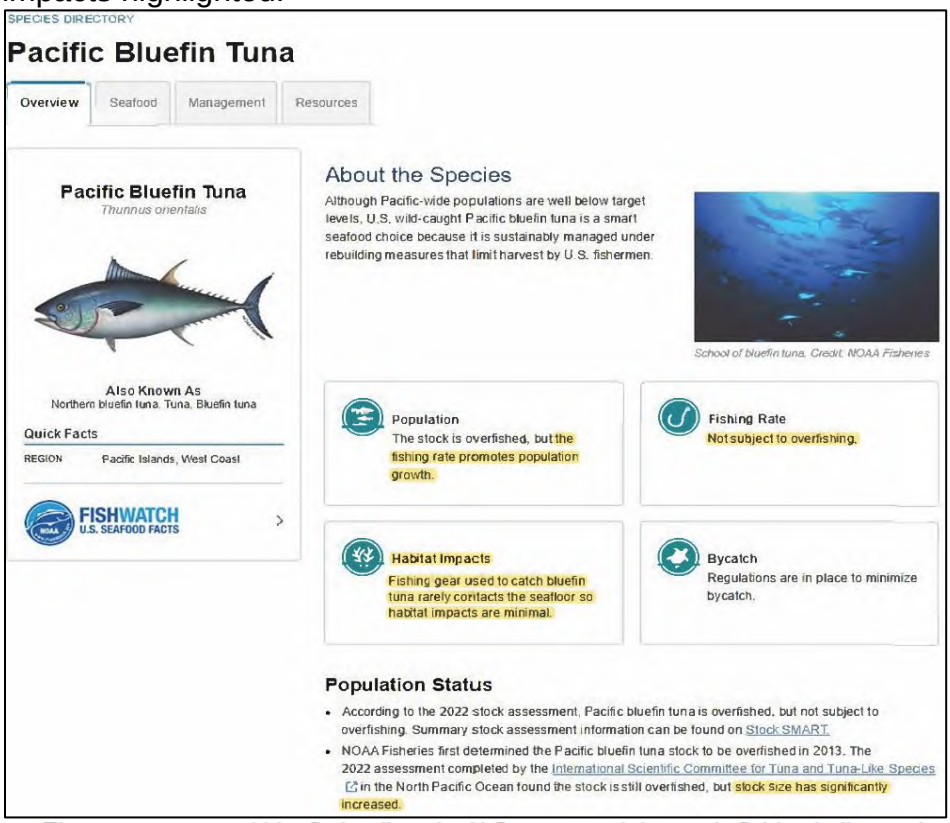
ACTION TYPE	YEAR	REQUEST	RATIONALE	ADAPTIVE MANAGEMENT ACTION TAKEN
Petition denied	2020	Petition submitted to amend MPA regulations to allow surfboard fishing at the South La Jolla SMR.	California Constitution, Article 1 Section 25, recreational take from a surfboard, even catch-and-release is not a fishery	No fishing is allowed in SMR per design criteria
Petition denied	2020	Petition submitted to establish MPA at Padaro Beach, Carpinteria, to protect great white shark nursery grounds.	An MPA with boating and fishing restrictions at Padaro Beach, Carpinteria, will help protect white shark nursery grounds.	MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species
Petition denied	2020	Petition submitted to add unlimited recreational take of invasive species *Sargasum horneri* in Crystal Cove SMCA	CDFW failed to respond and stop the spread of the invasive species *Sargassum horneri,* plus *Sargassum horneri* is not a marine resource.	No recreational culling permitted within MPAs.

Document 12: MPA Decadal Review-Appendix A: Comprehensive Recommendations for the Review-Recommends to open legacy grounds and allow pelagic/HMS take in MPAs (Highlighted below)

Regulatory and Review Framework

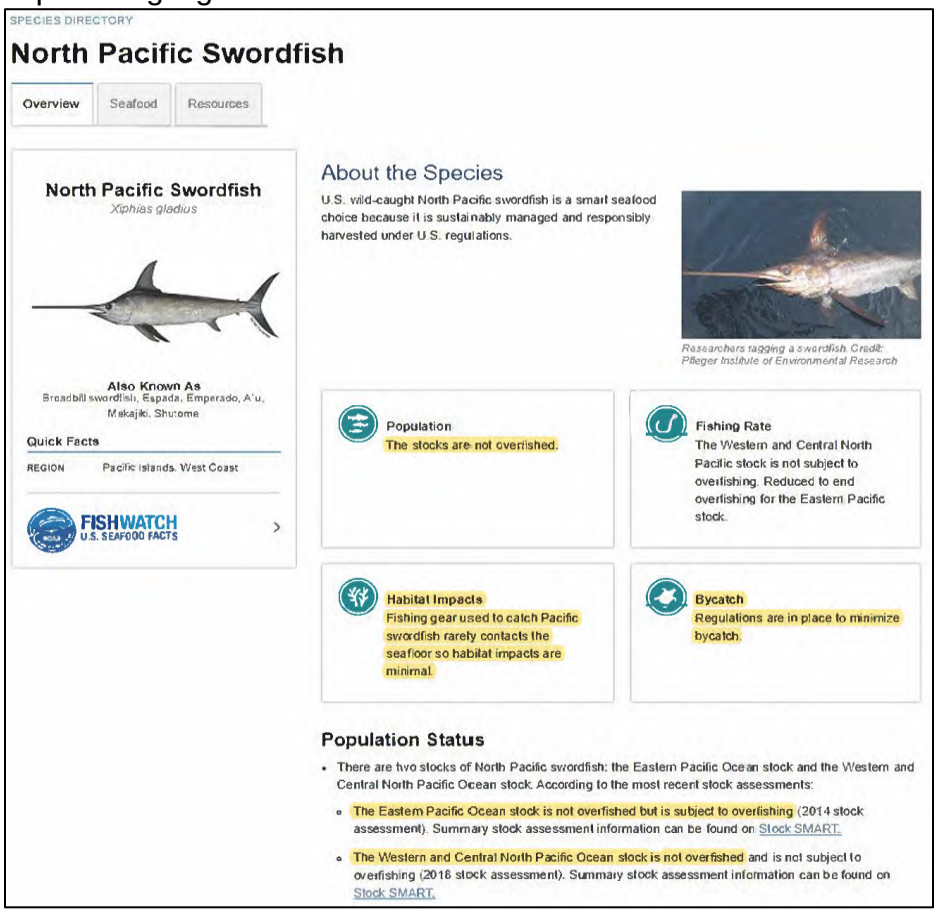
- Conduct annual engagement meetings with stakeholders to inform them about MPA Management Program activities that inform decadal reviews.
- Define clear management reporting goals, including the scale of reporting at the statewide, regional, or local scale.
- Ensure that adaptive management changes to individual MPAs and the MPA Network are evidence based.
- Simplify designations by changing no-take SMCAs to SMRs after maintenance of existing infrastructure is permitted.
- Return MPA fishing opportunities, especially in legacy fishing areas that were previously open to fishing.
- Allow take of migratory and pelagic species in MPAs that currently do not allow it.
- Allow commercial urchin take in MPAs that allow commercial lobster take.
- Do not allow boat operations within 100 yards of a remnant kelp forest within MPAs.
- Requests to change specific MPAs (not including formal petitions; see Appendix G):
  - Relocate Piedras Blancas MPA north, just south of Cape San Martin to protect nursery grounds.
  - Increase the size of Matlahuayl State Marine Reserve to include Point La Jolla and the Boomer Beach area where the sea lion colony is located.

Document 13: NOAA Stock and Fishery Analysis for Bluefin Tuna, stock status, and minimal habitat impacts highlighted.



- The average annual bluefin landings by U.S. commercial vessels fishing in the eastern Pacific Ocean represent only 2 percent of the average annual landings from all fleets fishing there.

Document 14: NOAA Stock and Fishery Analysis for Swordfish, stock status and minimal habitat impacts highlighted.



SPECIES DIRECTORY

North Pacific Swordfish

Overview | Seafood | Resources

North Pacific Swordfish
Xiphias gladius

Also Known As
Broadbill swordfish, Espada, Emperado, A'u, Makajiki, Shutome

Quick Facts

REGION Pacific Islands, West Coast

FISHWATCH U.S. SEAFOOD FACTS

About the Species

U.S. wild-caught North Pacific swordfish is a smart seafood choice because it is sustainably managed and responsibly harvested under U.S. regulations.

Researchers tagging a swordfish. Credit: Pfleger Institute of Environmental Research

Population
The stocks are not overfished.

Fishing Rate
The Western and Central North Pacific stock is not subject to overfishing. Reduced to end overfishing for the Eastern Pacific stock.

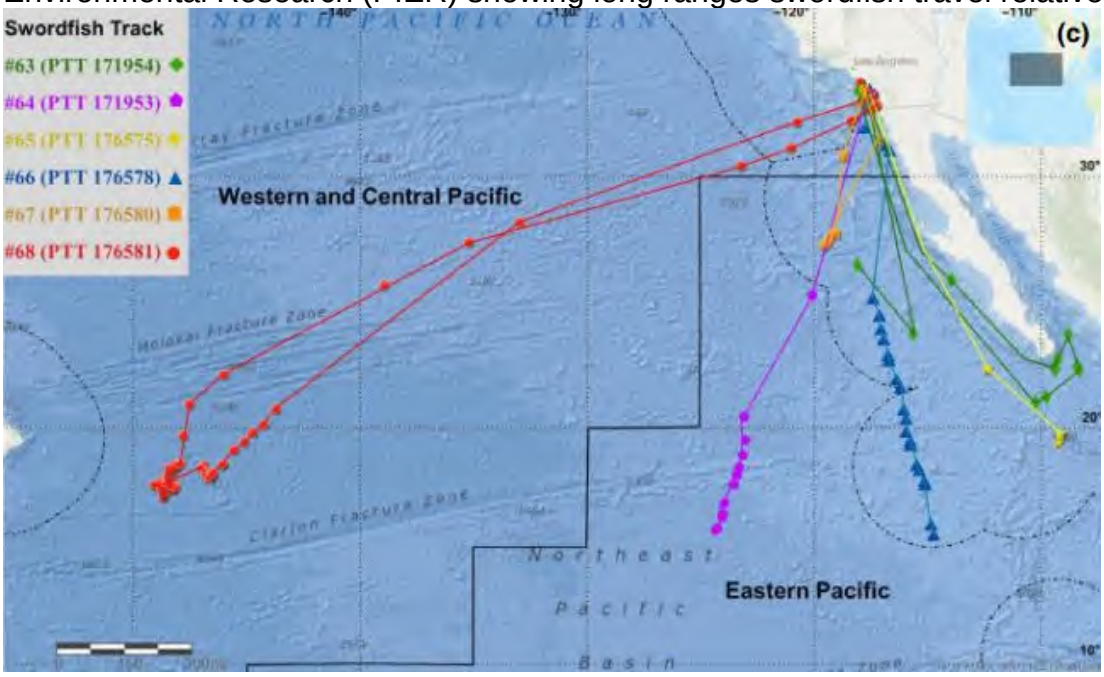
Habitat Impacts
Fishing gear used to catch Pacific swordfish rarely contacts the seafloor so habitat impacts are minimal.

Bycatch
Regulations are in place to minimize bycatch.

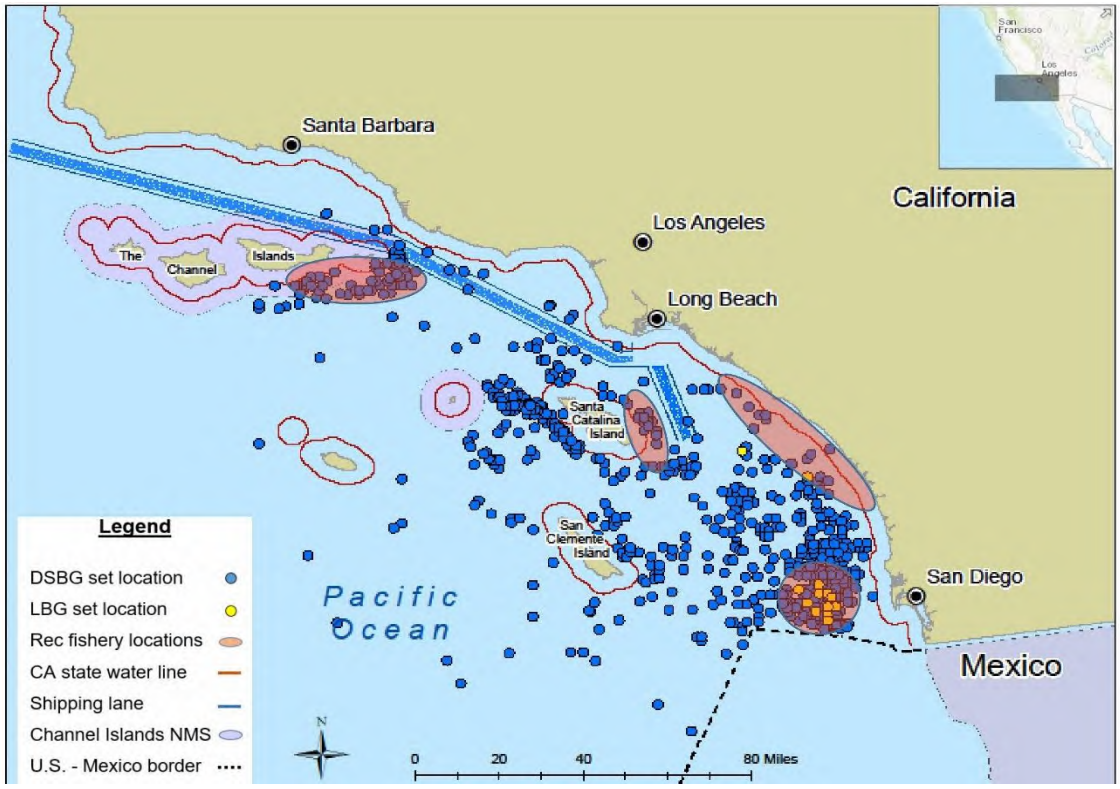
Population Status

- There are two stocks of North Pacific swordfish: the Eastern Pacific Ocean stock and the Western and Central North Pacific Ocean stock. According to the most recent stock assessments:
  - The Eastern Pacific Ocean stock is not overfished but is subject to overfishing (2014 stock assessment). Summary stock assessment information can be found on Stock SMART.
  - The Western and Central North Pacific Ocean stock is not overfished and is not subject to overfishing (2018 stock assessment). Summary stock assessment information can be found on Stock SMART.

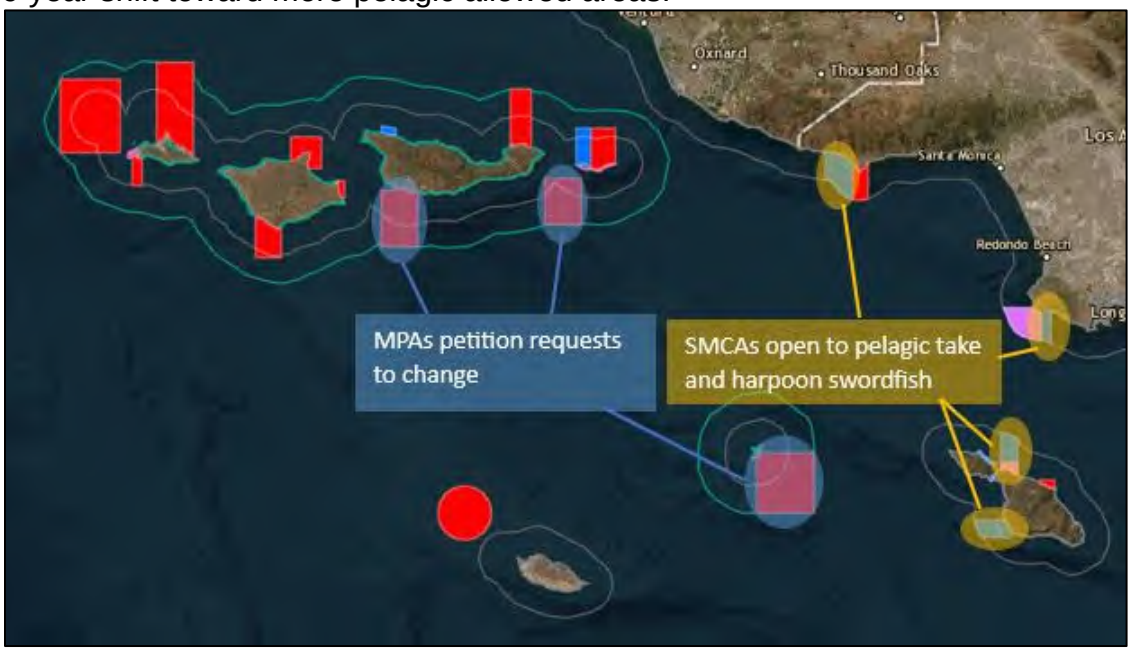
Document 15: Swordfish migration data collected via satellite tags deployed by the Pfleger Institute of Environmental Research (PIER) showing long ranges swordfish travel relative to the MPAs.



Document 16: DSBG and deep drop fishery efforts map displaying the wide area HMS fishing activity covers, and lack of northern Santa Cruz and Anacapa island efforts, where the only 2 SMCAs are located.



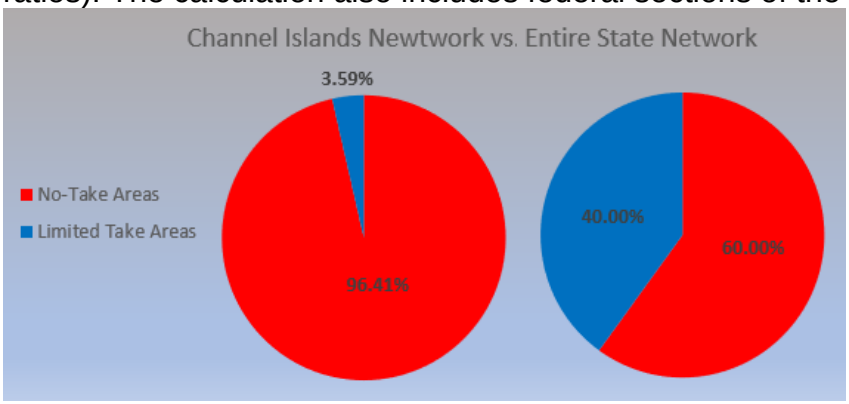
Document 17: Current pelagic finfish limited take SMCAs outside of the Channel Islands Network. These limited take MPAs were implemented in 2012, after the island network in 2003, and display the 9 year shift toward more pelagic allowed areas.



Document 18: Definition of State Marine Conservation Areas per California Code of Regulations Title 14 Section 632(a)(1)(C). The recommended change would make these MPAs effectively SMCAs and MCAs with limited HMS take and CPS possession.

(C) State Marine Conservation Areas: In a state marine conservation area, it is unlawful to injure, damage, take, or possess any living, geological, or cultural marine resource for commercial or recreational purposes, or a combination of commercial and recreational purposes except as specified in subsection 632(b), areas and special regulations for use. The department may issue scientific collecting permits pursuant to Section 650. The commission may authorize research, education, and recreational activities, and certain commercial and recreational harvest of marine resources, provided that these uses do not compromise protection of the species of interest, natural community, habitat, or geological features.

Document 19: Charts displaying no-take vs limited-take areas around the Channel Islands vs. the whole State MPA Network showing the disparity of no-take areas around the islands. If the changes are made, this disparity would all but disappear (see Table 1 in the analysis for before and after ratios). The calculation also includes federal sections of the MPAs.



Document 20: How the regulatory language could read if the preferred proposed change was selected (limited HMS take, deep drop methods and federal DSBG allowed, no nearshore closure) Existing regulation modifications presented similar to how CDFW shows yearly changes, ~~crossed out~~ being removed regulation and red being the amended regulation. State and federal sections are listed with proposed changes. For simplicity the federal amendments will follow the states for the MPA specific changes.

State and Federal Definition Modifications-

Amend: 14 CCR § 632 (a)** **and** 15 CFR 922.71:

(13) Highly Migratory Species. Highly migratory species, for the purpose of this section, are a subset of finfish defined as: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). *Marlin is not allowed for commercial take

(14) Coastal Pelagic Species: Coastal pelagic species, for the purpose of this section, are a subset of finfish and invertebrates defined as: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens).

**(13) and (14) exclusive to 14 CCR § 632 (a), amendments to 15 CFR 922.71 would read identical but not include "(13)" and "(14)." Highly Migratory species and Coastal Pelagic species are defined under State regulations (Title 14 §1.49 and 1.39), meaning the change to Title 14 § 632 (a) may not be required.

State MPA Modifications-

Amend: 14 CCR § 632 (b) (109)

(109) Gull Island State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed except where noted:

33° 58.065' N. lat. 119° 50.967' W. long.;

33° 58.000' N. lat. 119° 51.000' W. long.;

33° 58.000' N. lat. 119° 53.000' W. long.;

33° 55.449' N. lat. 119° 53.000' W. long.; thence eastward along the three nautical mile offshore boundary to

33° 54.257' N. lat. 119° 48.000' W. long.; and

33° 57.769' N. lat. 119° 48.000' W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.
2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

Amend: 14 CCR § 632 (b) (114)

(114) Footprint State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the straight lines connecting the following points in the order listed except where noted:

33° 59.300' N. lat. 119° 30.965' W. long.;

33° 57.510' N. lat. 119° 30.965' W. long.; thence eastward along the three nautical mile offshore boundary to

33° 57.264' N. lat. 119° 25.987' W. long.;

33° 59.300' N. lat. 119° 25.987' W. long.; and

33° 59.300' N. lat. 119° 30.965' W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.

2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

Amend: 14 CCR § 632 (b) (116)

(116) Santa Barbara Island State Marine ~~Reserve.~~ Conservation Area.

(A) This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed except where noted:

33° 28.500' N. lat. 119° 01.813' W. long.;

33° 28.500' N. lat. 118° 58.051' W. long.; thence along the three nautical mile offshore boundary to

33° 24.842' N. lat. 119° 02.200' W. long.; and

33° 27.911' N. lat. 119° 02.200' W. long.

(B) ~~Area restrictions defined in subsection 632(a)(1)(A) apply.~~ Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:
1. The recreational take of highly migratory species is allowed.
2. The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed. The use of standard deep-set-buoy-gear is permitted outside of state waters (3nm).
3. The possession of coastal pelagic species is allowed.

NOTE: It may not be required to mention deep-set-buoy-gear (DSBG) in the state regulation as it would not be allowed in state waters. However, as all regulations (State and federal) may be listed under one "rulebook" this mention of federal DSBG allowance maybe needed.

Federal Modifications-

Amend: 15 CFR 922.73(b):

(b) ***Marine conservation area.*** Unless prohibited by 50 CFR part 660 (Fisheries off West Coast States), the following activities are prohibited and thus unlawful for any person to conduct or cause to be conducted within the specified marine conservation areas described in appendix C to this subpart, except as specified in paragraphs (b) through (e) of § 922.72:

(b.1). Anacapa Island Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for pelagic finfish; or

(ii) Commercial and recreational fishing for lobster.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for lobster or pelagic finfish, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.2) Gull Island (Santa Cruz Island) Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.3) Footprint Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

(b.4) Santa Barbara Island Marine Conservation Area

(1) Harvesting, removing, taking, injuring, destroying, collecting, moving, or causing the loss of any Sanctuary resource, or attempting any of these activities, except:

(i) Recreational fishing for highly migratory species; or
(ii) Commercial fishing for highly migratory species by hook-and-line and harpoon. DSBG is allowed inside of federal waters.
(iii) Possession of coastal pelagic species.

(2) Possessing fishing gear on board a vessel, except legal fishing gear used to fish for highly migratory species, unless such gear is stowed and not available for immediate use.

(3) Possessing any Sanctuary resource, except legally harvested fish.

Amend: Appendix B to Subpart G of Part 922 (Marine Reserve Boundaries) for 15 CFR 922 B.4, B.5, B.6, B.7, and B.8.

~~B.4. Gull Island (Santa Cruz Island) Marine Reserve~~

~~The Gull Island Marine Reserve (Gull Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–4, and the following textual description.~~

~~The Gull Island boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi~~

~~State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.~~

~~Table B–4—Gull Island (Santa Cruz Island) Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.86195° N~~	~~119.80000″ W~~
~~2~~	~~33.86195° N~~	~~119.88330″ W~~
~~3~~	~~33.92690° N~~	~~119.88330″ W~~
~~4~~	~~33.90700° N~~	~~119.80000″ W~~
~~5~~	~~33.86195° N~~	~~119.80000″ W~~

B.4. Scorpion (Santa Cruz Island) Marine Reserve

The Scorpion Marine Reserve (Scorpion) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–5, and the following textual description.

The Scorpion boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–4—Scorpion (Santa Cruz Island) Marine Reserve

Point	Latitude	Longitude
1	34.15450° N	119.59170″ W
2	34.15450° N	119.54670″ W
3	34.10140° N	119.54670″ W
4	34.10060° N	119.59170″ W
5	34.15450° N	119.59170″ W

~~B.6. Footprint Marine Reserve~~

~~The Footprint Marine Reserve (Footprint) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–6, and the following textual description.~~

~~The Footprint boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward and then southeastward until it intersects the line defined by connecting Point 4 and Point 5 along a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.~~

~~Table B–6—Footprint Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.90198 ° N~~	~~119.43311 ″ W~~
~~2~~	~~33.90198 ° N~~	~~119.51609 ″ W~~
~~3~~	~~33.96120 ° N~~	~~119.51609 ″ W~~
~~4~~	~~33.95710 ° N~~	~~119.43311 ″ W~~
~~5~~	~~33.90198 ° N~~	~~119.43311 ″ W~~

B.5. Anacapa Island Marine Reserve

The Anacapa Island Marine Reserve (Anacapa Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–7, and the following textual description.

The Anacapa Island boundary extends from Point 1 to Point 2 along a straight line. It then extends to the 3 nmi State boundary where a line defined by connecting Point 2 and Pont 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–5—Anacapa Island Marine Reserve

Point	Latitude	Longitude
1	34.08330 ° N	119.41000 ″ W
2	34.08330 ° N	119.35670 ″ W
3	34.06450 ° N	119.35670 ″ W
4	34.06210 ° N	119.41000 ″ W

Point	Latitude	Longitude
5	34.08330 ° N	119.41000 ″ W

~~B.8. Santa Barbara Island Marine Reserve~~

~~The Santa Barbara Island Marine Reserve (Santa Barbara) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–8, and the following textual description.~~

~~The Santa Barbara boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line. The boundary then extends from Point 5 to Point 6 along a straight line.~~

~~Table B–8—Santa Barbara Island Marine Reserve~~

~~Point~~	~~Latitude~~	~~Longitude~~
~~1~~	~~33.36320 ° N~~	~~118.90879 ″ W~~
~~2~~	~~33.36320 ° N~~	~~119.03670 ″ W~~
~~3~~	~~33.41680 ° N~~	~~119.03670 ″ W~~
~~4~~	~~33.47500 ° N~~	~~118.97080 ″ W~~
~~5~~	~~33.47500 ° N~~	~~118.90879 ″ W~~
~~6~~	~~33.36320 ° N~~	~~118.90879 ″ W~~

Amend: Appendix C to Subpart G of Part 922 (Marine Conservation Area ~~Boundary~~ Boundaries) for 15 CFR 922

C.2. Gull Island (Santa Cruz Island) Marine Conservation Area

The Gull Island Marine Conservation Area (Gull Island) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–4, and the following textual description.

The Gull Island boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary then follows the 3 nmi State boundary westward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.

Table B–4—Gull Island (Santa Cruz Island) Marine Conservation Area

Point	Latitude	Longitude
1	33.86195 ° N	119.80000 ″ W

Point	Latitude	Longitude
2	33.86195 ° N	119.88330 ″ W
3	33.92690 ° N	119.88330 ″ W
4	33.90700 ° N	119.80000 ″ W
5	33.86195 ° N	119.80000 ″ W

C.3. Footprint Marine Conservation Area

The Footprint Marine Conservation Area (Footprint) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–6, and the following textual description.
The Footprint boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward and then southeastward until it intersects the line defined by connecting Point 4 and Point 5 along a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line.
Table B–6—Footprint Marine Conservation Area

Point	Latitude	Longitude
1	33.90198 ° N	119.43311 ″ W
2	33.90198 ° N	119.51609 ″ W
3	33.96120 ° N	119.51609 ″ W
4	33.95710 ° N	119.43311 ″ W
5	33.90198 ° N	119.43311 ″ W

C.4. Santa Barbara Island Marine Conservation Area
The Santa Barbara Island Marine Conservation Area (Santa Barbara) boundary is defined by the 3 nmi State boundary, the coordinates provided in Table B–8, and the following textual description.
The Santa Barbara boundary extends from Point 1 to Point 2 along a straight line. It then extends along a straight line from Point 2 to the 3 nmi State boundary where a line defined by connecting Point 2 and Point 3 with a straight line intersects the 3 nmi State boundary. The boundary follows the 3 nmi State boundary northeastward until it intersects the line defined by connecting Point 4 and Point 5 with a straight line. At that intersection, the boundary extends from the 3 nmi State boundary to Point 5 along a straight line. The boundary then extends from Point 5 to Point 6 along a straight line.
Table B–8—Santa Barbara Island Marine Conservation Area

Point	Latitude	Longitude
1	33.36320 ° N	118.90879 ″ W
2	33.36320 ° N	119.03670 ″ W
3	33.41680 ° N	119.03670 ″ W
4	33.47500 ° N	118.97080 ″ W
5	33.47500 ° N	118.90879 ″ W
6	33.36320 ° N	118.90879 ″ W

Links to data sources:

1. CDFW Marine Species Portal: https://marinespecies.wildlife.ca.gov/ for Bluefin Tuna, Swordfish, and Striped Marlin
2. NOAA Species Directory: https://www.fisheries.noaa.gov/species-directory for North Pacific Swordfish and Pacific Bluefin Tuna
3. PIER papers: https://pier.org/resources/publications/ for swordfish migratory movements DOI: 10.1111/fog.12461, and DOI:10.1111/j.1365-2419.2010.00543.x
4. WCPFC stock analysis: https://www.wcpfc.int/current-stock-status-and-advice for Pacific Bluefin Tuna, North Pacific Swordfish, North Pacific Striped Marlin
5. Oceana DSBG Sustainability Article: https://usa.oceana.org/press-releases/new-day-dawns-for-whales-sea-turtles-and-sustainable-swordfish-fishing-off-californias-shores/
6. PEW DSBG Sustainability Article: https://www.pewtrusts.org/en/research-and-analysis/articles/2023/06/22/us-approves-sustainable-way-to-catch-swordfish-off-west-coast
7. MPA regional info: https://californiampas.org/mpa-regions/north-coast-region
8. Channel Islands Network info (NOAA): https://channelislands.noaa.gov/about/maps.html#:~:text=Channel%20Islands%20National%20Marine%20Sanctuary%20protects%201%2C470%20square%20miles%20of,Miguel%2C%20and%20Santa%20Barbara%20islands
9. MPA Master Plan hub: https://wildlife.ca.gov/Conservation/Marine/MPAs/Master-Plan

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:
    - Would give local charter businesses better access to local Northern Channel Island banks, helping business and reducing fuel costs and emissions spent traveling further offshore.
    - Would significantly assist the commercial swordfish industry, returning legacy harpoon fishery waters, and allowing for more sustainable, domestic product to be landed by harpoon and DSBG.

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

None to my knowledge.

SECTION 3: FGC Staff Only

Date received: 11/22/23.

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

California Fish and Game Commission

Compilation of Public Comments on Petition 2023-15MPA_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.

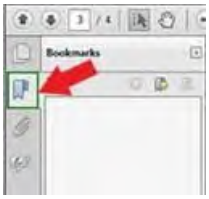
Note: Commission meeting materials include a representative selection of comments, rather than a comprehensive suite of all related comments received. Given the large volume of public comments received, the Commission has directed staff to summarize comments and provide a representative selection in 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

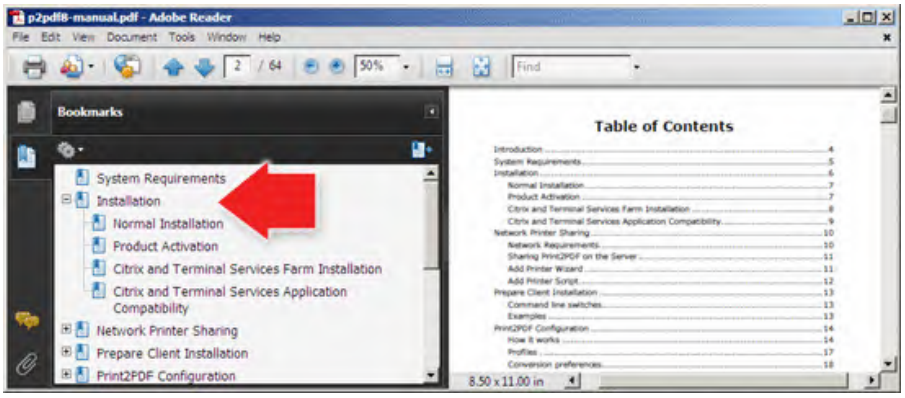
EASY GUIDE TO USING THE PACKET

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.



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: Blake Hermann <[redacted]>
Sent: Friday, December 22, 2023 11:07 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Supplemental Comment on MPA Petition 2023-15MPA

Hello,
Please see the attached document, supplemental comment of MPA Petition 2023-15MPA.

Thank you,
Blake Hermann

Dear Commission,

It is my community's belief that the changes requested in this petition are not only reasonable but justified under the current goals of the network. The petition lays out no new ideas or concepts, but is rather grounded in the framework of the MPA network and the goals it, and the commission, have set. This includes the goals of the founding MPA Documents for the Channel Islands, the 2016 MPA Master Plan, and comments on previously submitted petitions stating MPAs are not designed to protect pelagic or highly migratory species. The proposed HMS limited-take areas would allow for sustainable fisheries to follow HMS into these areas, while still protecting the local ecosystems and not erasing any existing protections on the local, non-pelagic ecosystems the MPAs are intended for. These areas would serve as glowing examples of conservation without the complete shutdown of reasonable fishing access for HMS as they randomly pass through the MPA network.

This change would demonstrate the necessary balance we must achieve moving into the future. Targeted conservation efforts catered towards groups of similarly behaving species (pelagic vs non-pelagic) is a goal we must strive for, rather than the broad approach these three MPAs are currently following.

If made, the changes would equalize the wide gap in no-take MPAs specifically around the Channel Islands Park. Currently, of the 21% of the park that is under some protection, 96% are no-take MPAs. When compared to the 60% of no-take MPAs elsewhere in the State we can see this disparity in full effect. This change would not only help remedy that disparity, but would show the stakeholders the commission's willingness to make reasonable HMS allowance in an area currently saturated with no-take MPAs. Additionally, the proposed changes will provide new research opportunities for observing previous no-take areas open to HMS (a topic that has never been researched before).

In the case of enforcement, these changes will result in little to no difference in enforcement effort. Regardless of regulation, no-take or limited-take, officers will continue to inspect vessels inside of a closure for violations. The only difference under limited-take areas is the small list of allowances that would not result in a citation. Under current no-take rules, any fishing activity or fish onboard results in a citation. Under the proposed limited-take rule, only some types of fishing and species of fish may be legally possessed. For enforcement, almost no changes in procedure are required.

Option 2 of this petition proposes changes that are best suited for the 3 MPAs in question: The Footprint, Gull Island, and Santa Barbara Island (SBI). Allowing HMS limited-take with CPS possession for baitfish enables anglers with the opportunity to track HMS as they move through these areas with the currents, while still safeguarding any local, non-pelagic species (such as groundfish), thereby preserving the original intentions of these MPAs.

An online petition, signable by the public, was recently made available (found here: https://chng.it/2wy2dHSS6r). After just one month, the petition garnered over 1,100 signatures and produced comments that the public wishes the Commission to hear (Signature list can be provided if desired). Below are just some of the comments from researchers, and commercial and recreational anglers.

- Richard Cravey commented: "I sportfish and also worked on the CCFRP project out of Scripps Institution of Oceanography at UC San Diego. I recognize the importance and efficacy of

protecting habitat for residential species of fishes like rockfish, wrasses, etc. but I see mismanagement of highly migratory species like jacks and tunas. I believe amendments to the MPAs are a viable way to improve the mismanagement of those species that are not in need of protection through the MPA network."

- Wes Pierson commented: "I believe these changes make sense to the fishery while still providing protection to non-migratory species the MPA was designed for."

- Vinnie Vernola commented: "It will give valuable access to fish swordfish and bluefin tuna that frequent these MPAs year after year. Since these fish migrate and do not live or stay in these areas as their permanent home it should not affect populations in my belief."

- Bryce Hermann commented: "Highly migratory species, migrate large spans of areas sometimes even coast to coast. I believe this will still protect the ground fish which the closures were meant for in the first place but give us an opportunity to target some of the HMS species certain times of the year as they pass through."

- Mark Litwiler commented: "I'm signing because changing these closures makes sense and it still allows the fish that need protection to remain safe but opens new area for recreational and clean harvest commercial fishing to take place on the migratory species. It would spread out the area fishable and lessen the pressure as well on the migratory fish that get harvested."

- Taylor Sanford commented: "I'm in support of commercial and sport fishing in these areas as it will benefit the science and knowledge of fish in the area, feed the community, and boost the tourism economy in the surrounding areas."

Thank you for your consideration,

Blake Hermann

From: Sean Burke <[redacted]>
Sent: Sunday, January 28, 2024 01:07 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Petition 2023 -15MPA

To whom it may concern,
If anything this petition may have some success in informing the Wardens w/ their continued lack of knowledge w/ the Harpoon fishery . Trust me I know and so does Officer Sean Stanton.
Focus your time and our taxpayer money on proper enforcement that make's a difference towards conservation . Patrolling imaginary borders and buffer zones makes no sense w/ anything swordfish .
There are no fences for Xiphias gladius .
Pass this petition .

Capt. Sean Burke
F/V PILIKIA
#1134177
F&G 03176

From: Eric Praske <[redacted]>
Sent: Wednesday, January 31, 2024 6:55 PM
To: FGC <FGC@fgc.ca.gov>
Subject: FGC agenda item 10 comment letter

Hello,

I am submitting the attached comment letter regarding agenda item 10 on the FGC February meeting agenda.

Eric Praske

FGC – Regulation Change Petitions January 31, 2024

Dear California Fish and Game Commissioners,

I urge the FGC to deny petitions 2023-15MPA and 2023-16MPA, which propose the conversion of State Marine Reserves (SMRs) into take-allowed State Marine Conservation Areas (SMCAs). Granting these petitions would establish a perilous precedent, signaling to the fishing community that the Fish and Game Commission (FGC) may entertain further conversions of SMRs, thereby jeopardizing the foundational role they play in California's Marine Protected Area (MPA) Network.

California's MPA Network relies heavily on the robust protections afforded by SMRs and no-take SMCAs, which collectively comprise less than 10% of state waters. Highly mobile pelagic species frequently traverse MPA boundaries and are statistically more likely to exist in the remaining 90% of state waters that allow take. Moreover, many of these species are more likely to inhabit federal waters, where the coverage of no-take MPAs is significantly lower compared to state waters. There are ample opportunities to fish for pelagic species in both federal and state waters without compromising protections in existing no-take MPAs. The petitioners therefore fail to present a compelling reason to warrant jeopardizing the integrity of SMRs.

These petitions directly contradict the MPA Petition Guiding Principles established during the July 2023 Marine Resources Committee meeting. Specifically, the Guiding Principles emphasize that successful MPA petitions should "maintain or enhance the protections and integrity of the MPA Network." [1] Petitions 2023-15MPA and 2023-16MPA fail to meet this standard, as they do not contribute to the enhancement of protections within MPAs. On the contrary, the conversion of cornerstone SMRs into less protected SMCAs threatens the integrity of the MPA Network. Furthermore, these petitions are incongruent with California's 30x30 initiative, which aims to strengthen rather than weaken marine protections.

Granting these petitions would compromise MPA enforcement. Shore-based observers, as well as technologies such as Marine Monitor,[2] will not be able to distinguish vessels that are fishing for pelagics from those that are fishing for prohibited species. While Wildlife Officers possess the authority to inspect catches onboard vessels, ordinary citizens and Allied Agencies — often responsible for reporting the majority of MPA violations — are not empowered to do so. Therefore, citizens and Allied Agencies will be less likely to report and/or contact potential violators as there will be uncertainty as to which species is being targeted by the fishermen onboard a vessel. This impedes the effectiveness of MPA enforcement.

In conclusion, I strongly urge the FGC to deny Petitions 2023-15MPA and 2023-16MPA in order to safeguard the integrity and effectiveness of California's MPA Network. Your commitment to upholding the principles that underpin the MPA Network is crucial for the conservation of our marine ecosystems and the sustainable management of California's fisheries.

Thank you for your attention to this matter.

Sincerely,

Eric Praske

Eric Praske
Laguna Beach

[1] Summary of Marine Protected Area (MPA) Regulation Change Petition Framework Discussion. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=214928&inline

[2] https://protectedseas.net/

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

Submitted via email: 2/1/2024

To: California Fish and Game Commission

Subject: Comments - 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

Recommendation: DENY PETITION

Ecological Importance of the Channel Islands

The location of the Channel Islands and their surrounding waters at the confluence of two major ocean currents supports globally significant biodiversity and a uniquely productive marine environment. The unusual ecosystem value of the area has led to designation of a UNESCO Biosphere Reserve, a National Park and a National Marine Sanctuary. The area's kelp forests, seagrass beds, rocky reefs, sandy seafloor, and submarine canyons support more than 1,000 species of fish, invertebrates, and algae and provides essential vital nesting and feeding grounds for more than 90% of the sea birds in southern California and for 26 species of marine mammals. The area also supports historic shipwrecks, Chumash culture, and a wide range of commercial and recreational activities such as tourism and fishing.

The petitions argue that because a lower level of no-take protection was applied to MPA planning in other regions of the state, the protection established at the Channel Islands should be weakened and reduced. This ignores both the fact that the Channel Islands MPA planning process was conducted under a different set of criteria than the Marine Life Protection Act Initiative and the unique ecological value of the Channel Islands National Marine Sanctuary and National Park. The Channel Islands are a remarkable ecological treasure and warrant the highest level of protection. The Channel Islands National Marine Sanctuary and associated MPA network also represents an extremely small proportion of southern California waters with the vast major of the area open to fishing for highly migratory species, pelagic finfish, and/or coastal pelagic finfish. Accordingly, these petitions are unwarranted.

Background

Between 1999 and 2001, the Channel Islands National Marine Sanctuary and the California Department of Fish and Wildlife conducted a robust joint public process to consider the establishment of marine reserves in the Channel Islands National Marine Sanctuary. The process was informed by a 17-member Marine Reserves Working Group (MRWG) representing the public-at-large, commercial fishing interests, recreational fishing and diving, and non-consumptive interests; as well as a 16-member Science Advisory Panel and a five-member Socio Economic Panel to provide technical expertise and guidance. The Channel Islands Science Advisory Panel recommended that 30–50% of the Channel Islands National Marine Sanctuary be included in no-take areas to adequately achieve conservation and fisheries goals.[1]

The Channel Islands marine reserve planning process took 22 months and resulted in adoption of 13 marine protected areas by the California State Fish and Game Commission and the National Oceanic and Atmospheric Administration. The 13 MPAs form a network that covers approximately 240 square nautical miles and 21% of sanctuary waters, significantly less than recommended by the Scientific Advisory Panel. Eleven of the Channel Islands MPAs are no-take marine reserves, two MPAs are marine conservation areas allowing recreational fishing for pelagic fish and lobster and one also allows

[1]https://homes.msi.ucsb.edu/~lafferty/Publications/Marine%20Reserves_files/Airame.etal.03.EA.pdf

commercial lobster trapping. In the final round of MPA design, 10 significant modifications were made to the proposed MPA boundaries specifically to address concerns raised by commercial and recreational fishing interests.[2]

Notably, the public process of adopting the final Channel Islands MPA network entailed three large public forums, over a dozen public meetings, and submission of over 9,000 public comments with 94% of the comments received support marine reserves.

The petition's Problem Statement erroneously states (without evidence) that the three identified State Marine Reserves (SMRs) "unintentionally" protected "seasonal" (undefined) pelagic and highly pelagic species during the summer months. These protections were intentional, created specifically to provide undisturbed areas where marine life could aggregate, function, and perpetuate natural ecosystem functions such as foraging environments for sea birds, including bald eagles, peregrine falcons, and California brown pelicans that nest at that time on nearby islands also in Channel Islands National Park.

Importance of No-Take Marine Reserves

No-take marine reserves are recognized by scientists and resource managers to provide the highest level of protection for marine resources and also offer specific scientific value, and improved enforceability as compared to MPAs that are open to fishing.[3]

The specific value of no-take areas is explicitly called out in the Marine Life Protection Act which requires that California's MPA network include:

"an improved marine life reserve component ... designed according to each of the following guidelines:

(1) Each MPA shall have identified goals and objectives. Individual MPAs may serve varied primary purposes while collectively achieving the overall goals and guidelines of this chapter.

(2) Marine life reserves in each bioregion shall encompass a representative variety of marine habitat types and communities, across a range of depths and environmental conditions.

(3) Similar types of marine habitats and communities shall be replicated, to the extent possible, in more than one marine life reserve in each biogeographical region.

(4) Marine life reserves shall be designed, to the extent practicable, to ensure that activities that upset the natural ecological functions of the area are avoided."[4]

The designation of state marine reserves within Channel Islands National Park furthers the purpose of the park as established by Congress on March 5, 1980 (Public Law [PL] 96-199; 16 USC 410ff). Specifically, Congress stated that the purpose of Channel Islands National Park is to protect and connect the public to the nationally significant natural, scenic, wildlife, marine, ecological, historical, archeological, cultural, and scientific values of the Channel Islands in the state of California. This mandate is better achieved through the leadership of the Commission with their designation of SMRs so

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[2] https://nmschannelislands.blob.core.windows.net/channelislands-prod/media/docs/2001-marine-reserves-sac-history.pdf

[3] https://www.researchgate.net/publication/250219347_Biological_Responses_in_Marine_No-Take_Reserves_versus_Partially_Protected_Areas#:~:text=We%20demonstrate%20that%20while%20partially,to%20partially%20protected%20sites%20nearby.

[4] Fish and Game Code Section 2857 (c).

mandate is better achieved through the leadership of the Commission with their designation of SMRs so that these areas "shall be open to the public for managed enjoyment and study, the area shall be maintained to the extent practicable in an undisturbed and unpolluted state."[5]

This petition considers only effects on fishing, not on fish, marine ecosystem integrity, or marine wildlife, which are also purposes of California's marine protected areas. Thus, this petition does not meet number 4 of the guidelines mentioned above.

The petitioners also claim that the proposed changes would have "minimal impacts on the ecosystem". This claim is at odds with the claim that the changes would "allow for a more equitable 60/40 no-take to limited take closure ratio" and it does not address the underlying purpose of creating reserves that afford undisturbed behaviors such as aggregation, foraging, and competition among wild predators and prey. Framing this issue as 60% no-take to 40% limited-take considers only the area within State Marine Protected Areas, not the territorial waters, which are virtually all limited-take waters. As you know the territorial waters are expansive. Only 9% of the waters under state jurisdiction are classified as SMRs and even a smaller percentage of no-take reserves occur within the federal portion of territorial waters.

Given this, any potential growth of "new" business from the increased fishing opportunities created by the proposed changes would be proportional to the new areas made available; since that would be a modicum of the current area in these MPAs, there's not much potential increase in business for such a relatively large decrease in undisturbed marine environments – no-take reserves.

Adaptive Management

"Adaptive management" with regard to marine protected areas, means a management policy that seeks to improve management of biological resources, particularly in areas of scientific uncertainty, by viewing program actions as tools for learning. [6] The petition's proposal to convert SMRs to SMCAs is not an appropriate application of adaptive management as it would not improve management or assist managers in learning. Instead, the petitions would simply downgrade protection for the impacted MPAs. These petitions do not have scientific or management value but instead, appear to simply be an attempt by a particular stakeholder group to revisit the negotiations and compromise that was struck in 2001 when the Channel Islands MPAs were adopted.

The claim by the petitioners that the proposed changes would provide research opportunities to determine the effects of proposed fishing activity belies the earlier claim that new fishing activity would have no significant impact.

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[5] https://wildlife.ca.gov/Conservation/Marine/MPAs/Founding-Legislation

[6] Fish and Game Code Section 2852.

Conclusion

As natural resource managers who spent our careers dedicated to protection of the natural and cultural resources of the Channel Islands region and who were directly engaged in the extensive 1999-2001 public process to establish the Channel Islands MPAs, and the South Coast MLPA process, we urge you to deny these petitions and uphold the integrity of the Channel Islands MPA network.

Gary E. Davis
Marine Ecologist, National Park Service Oceans Program (retired)
Member, Channel Islands MPA Marine Reserves Working Group

Russell E. Galipeau, Jr
Superintendent Channel Islands National Park (retired)
Member, MLPA South Coast Stakeholder Working Group

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 22:56:46.81		Stan	Perry		[redacted]	San Diego	CA	[redacted]	US	Petition Signed
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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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2024-02-02 13:37:41.607	Mr.	Blane	Markham		[redacted]	Carmel	CA	[redacted]	US	Petition Signed
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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

United States Department of the Interior

NATIONAL PARK SERVICE
Channel Islands National Park
1901 Spinnaker Drive
Ventura, California 93001-4354

IN REPLY REFER TO:
2.D. (W3423)

OFFICIAL ELECTRONIC MAIL SENT VIA EMAIL
NO HARD COPY TO FOLLOW

February 9, 2024

Melissa Miller-Henson
Executive Director
Acting Tribal Advisor and Liaison
California Fish and Game Commission
Submitted to: fgc@fgc.ca.gov

Ms. Miller-Henson and Other Commission Members:

For more than two decades, Channel Islands National Park (park) and the State of California have been partners in both establishing and implementing the laws and regulations that protect the waters around and within Channel Islands National Park.

In response to petitions proposed to the California Fish and Game Commission (Commission), the park requests to consult directly with the Commission on any proposals which would change or impact Marine Protected Areas (MPAs) regulations within the boundaries of Channel Islands National Park. The park provides for one of the most significant oceanographic databases in California with 40 years of inventory and monitoring programming and provides direct protection of Marine Protected Areas within park waters. The data created and shared by the park contributed to the original case for establishing Marine Protected Areas.

A Brief History of Channel Islands National Park and Marine Protected Areas

Located off the coast of Southern California, the five Channel Islands within the national park boundary encompass a diverse and unique environment like few places on earth. Isolated from the mainland, the islands and their surrounding waters support sensitive, unique, and rare plants and animals, fragile ecological communities, and sacred cultural sites – some of the oldest known to North America. Channel Islands National Monument was created by presidential proclamation in 1938 and included Anacapa and Santa Barbara Islands. These protections were expanded out to one nautical mile in 1949 based upon a realization of the unique ocean life and underwater resources.

In 1978, the presidentially proclaimed protections for the one mile of water surrounding Anacapa and Santa Barbara Islands was removed in a Supreme Court case, which found: “California, and not the United States, has dominion over the submerged lands and waters within the one-mile belts surrounding Santa Barbara and Anacapa Islands within the Channel Islands National Monument.” (United States v. California, 436 U.S. 32 (1978)).

United States v. California established the clear need for the National Park Service at Channel Islands National Park to work directly with the State of California to research and protect the important waters surrounding the islands. In recognition of the uniqueness and special fragility of these resources, a total

of five of the islands—Anacapa, Santa Cruz, Santa Rosa, San Miguel, and Santa Barbara—and the submerged lands and waters within one nautical mile of each island, were designated by Congress as Channel Islands National Park on March 5, 1980.

In the following years, numerous state and federal regulatory efforts created overlapping and complementary federal and state protections of five northern islands and up to six miles of the surrounding waters. This includes Channel Islands National Park and Channel Islands National Marine Sanctuary, as well as thirteen MPAs. The success of these MPAs largely relies on complementary stewardship and protections.

Current Park Management of Marine Protected Areas

Channel Islands National Park employees perform a variety of functions on and around the islands which support resource stewardship and protections. Scientific research plays a central role in this stewardship.

In 1982, the park initiated the first inventory and monitoring program in the National Park Service, which sought to understand the health of the kelp forest and intertidal marine ecosystems surrounding the islands. This comprehensive database is used in the development of management strategies and actions needed to protect marine resources. The effective model of this program has since been replicated across the country and today, provides one of the most significant oceanographic databases which is used by institutions around the world for research.

The information from the park's inventory and monitoring program, across 70 categories of algae, invertebrates, and fish, was critical in establishing marine protected areas. Currently only about 20% (175-square miles) of waters around the park and sanctuary are set aside as marine reserves. Nearly 80% remains open to fishing. Fifteen percent of all commercial marine fisheries landings in the state come from the waters surrounding the park, an area that makes up about 3% of the California coastline. Management actions grounded in science ensure that decisions are sound and accurately depict current states and possible future effects. Studies conducted five and ten years after the marine protected areas were established show there is higher density of fish which means more marine life inside the marine protected areas versus outside them. Studies also show fish are bigger inside the marine protected areas versus outside them. For example, there are higher densities of California spiny lobster (Panulirus interruptus) and larger California sheephead (Semicossyphus pulcher) within MPA boundaries.

Another key component of resource stewardship is the day-to-day enforcement of the regulations set forth by rulemaking bodies, such as the California Fish and Game Commission. For this task, Channel Islands National Park established a Marine Protection Branch within its Visitor and Resource Protection Division (law enforcement). Today, that group is comprised of three officers, a Chief Ranger, and four patrol boats.

Interagency coordination and cooperation between the federal and state government in law enforcement is identified within the enabling legislation for Channel Islands National Park in 1980: "The Secretary is authorized and directed to enter into and continue cooperative agreements with the Secretary of Commerce and the State of California for the enforcement of Federal and State laws and regulations on those lands and waters within and adjacent to the park which are owned by the State of California." (16USC 410ff-3)

This congressional intent is carried out today by National Park Service law enforcement rangers who work alongside and in coordination with National Oceanic Atmospheric (NOAA) Administration Office of Law Enforcement officers, California Department of Fish and Wildlife officers, as well as members of the United States Coast Guard (USCG). The coordination between these different entities is crucial for effective and efficient enforcement of regulations and laws. It creates consistent interaction and enforcement postures with the public, allows for personnel pooling through joint patrol efforts, and information sharing on cases.

Law enforcement rangers and wardens are employing technology routinely to improve effectiveness. Systems like the marine monitor radar stations allow officers to determine where boats are in relation to MPAs. It can also establish trends and patterns of use in as well as assist with crime detection and prosecution. Another collaborative effort is compiling the data on where, when, what type and vessel information on fishing violations in and around the California coast. The results so far show that the marine protected areas located Channel Islands National Park and Marine Sanctuary experience a high volume of recreation and commercial fishing and approximately half of the violations within this area are related to MPA regulations. The results also show the highly collaborative nature of the enforcement work being done primarily by NPS law enforcement rangers and state wildlife officers. Through these means one can determine the effectiveness of marine protected areas as well as gain insight into the public's compliance and understanding of the regulations currently in place.

Importantly, all law enforcement within the MPAs relies upon public education and clear understanding of established regulations. Changing those regulations would likely require an educational campaign for those who fish within MPAs.

Conclusion

The February 14th-15th Commission Meeting is quickly approaching and at that meeting the park understands the Commission is scheduled to, "Consider whether to grant, deny, or refer for additional review, petitions for regulation change received at previous meetings." Within the current proposals, there are more than a dozen changes in regulation or management actions on MPAs within the legislative boundaries of Channel Islands National Park. The park would like to request the Commission engage directly with the park before coming to any decision that would curtail any protections currently in place within park boundaries. Consultation would allow a dialogue around the current efficacy of MPAs within the park boundary, potential management implications and potential impacts to enforcement of new regulations.

In the future and based upon our substantial history of collaboration, we would like to work directly with the Commission to share the body of knowledge and experience developed at Channel Islands National Park when the Commission is considering and assessing petitions or other actions which propose changes to the level of protections afforded to existing Marine Protected Areas within the park's legislated boundary.

Thank you for the opportunity to provide comments to the Commission, and for the long and successful partnership in stewarding resources of the Marine Protected Areas within the boundary of Channel Islands National Park.

Respectfully,

Ethan R. McKinley
Superintendent

From: Douglas McCauley <[redacted]>
Sent: Wednesday, February 14, 2024 11:54 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Comment on pelagic fishing in MPAs

Drawing from my experience as a Professor of Marine Biology, my own research on design traits that promote the effectiveness of marine protected areas, and my familiarity with biodiversity and coastal economy trends along the Central Coast, I wish specifically to comment on proposals under discussion to open certain marine protected areas in the Channel Islands to the fishing of pelagic species. I strongly oppose any such changes. Allowing pelagic fishing within marine protected areas would invertedly result in increased take (both purposeful and accidental) of non-target species that would ostensibly be protected. Such unallowed take of species, such as the California sheephead, various rockfish species, and kelp bass, is already high in other Southern California SMCAs. Myriad meta-analysis of attributes that make MPAs most effective find that fully no-take MPAs maximize benefits to biodiversity - and associated benefits to fishers profiting from spillover from the MPAs. Furthermore, in our own recent research, we find that MPAs in Channel Islands benefit constituents of the California economy directly, such as the recreational SCUBA industry that preferentially uses these MPAs. Any changes to the status of these MPAs would be undoing a decade of slowly accruing benefits for California coastal biodiversity and would represent a blow to our diversified state coastal economy.

Thank you for your consideration of my comment.

Regards
Douglas McCauley

_____
Professor
Department of Ecology, Evolution, and Marine Biology
University of California, Santa Barbara

From: Eric Praske <[redacted]>
Sent: Thursday, June 27, 2024 04:56 PM
To: FGC <FGC@fgc.ca.gov>
Subject: July MRC comment letter

Good afternoon,

I would like to submit the attached comment letter for consideration at the July MRC meeting. Thank you.

Eric

Dear California Fish and Game Commissioners,

Thank you for the opportunity to comment on the proposed categorization of Marine Protected Area (MPA) petitions.[1] I support the Department of Fish and Wildlife's (DFW) proposed categorization and would like to offer specific comments on three of the petitions.

Petition 2023-22MPA:
I agree with the classification of this petition as a Bin 1 near-term priority with limited controversy. I urge both the DFW and the Fish and Game Commission (FGC) to advance this petition promptly.

Petitions 2023-15MPA and 2023-16MPA:
I support the inclusion of these petitions in Bin 2 due to their highly controversial nature. These petitions aim to weaken protections in State Marine Reserves (SMRs), which form the backbone of California's MPA Network. In my previous letter, I highlighted important considerations regarding the potential for these petitions to compromise MPA enforcement and California's 30x30 initiative.[2] The Ocean Protection Council's recently released 30x30 Decision Making Framework for Coastal Waters underscores the importance of maintaining strong protections, especially in areas that are already highly protected.[3] Granting these petitions would severely undermine the robust protections afforded by SMRs and signal to the fishing community that FGC would entertain future petitions to weaken highly protected areas. I strongly urge the FGC to adopt a firm position that any petitions aiming to weaken protections in SMRs will not be granted.

Thank you for considering my comments. I look forward to closely following the MPA petition review process.

Sincerely,

Eric Praske

Eric Praske
Laguna Beach

[1] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=223591&inline
[2] Significant Comments Received for the February 14-15, 2024 Commission Meeting Related to Agenda Item 10, Exhibit 3, available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=219990&inline
[3] https://opc.ca.gov/wp-content/uploads/2024/05/Item-7-Exhibit-A-Draft-30x30-Decision-Making-Framework-Coastal-Waters-508.pdf

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: Emily Parker <[redacted]>
Sent: Friday, July 5, 2024 04:41 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Public Comment on FGC MRC July Agenda Item #2

Good Afternoon,

Please accept the attached letter as public comment from NGOs on the Fish and Game Commission Marine Resources Committee July Meeting Agenda Item #2: Marine protected area (MPA) regulation change petitions evaluation process. Please feel free to reach out with any questions.

Best,
Emily

Heal the Bay

EMILY PARKER | COASTAL AND MARINE SCIENTIST
She/Her/Hers (What does this mean?)
Heal the Bay
1444 9th Street
Santa Monica, CA 90401
[redacted]

July 5, 2024

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

Submitted electronically via fgc@fgc.ca.gov

RE: Comments on Fish and Game Commission July 17-18, 2024 Marine Resources Committee Agenda Item 2 - MPA Petition Review Process

Dear President Murray and Honorable Commissioners:

The undersigned organizations are dedicated to ocean protection in California and have decades of combined experience in marine protected area (MPA) management, research, compliance, education, and outreach. We applaud the Fish and Game Commission's (FGC) commitment to meeting the goals of the Marine Life Protection Act (MLPA) through support of the Marine Protected Area (MPA) Network, including adaptive management as part of the decadal management review. As the FGC and California Department of Fish and Wildlife (CDFW) begin evaluating petitions to modify California's MPA Network, our organizations respectfully offer the following comments on agenda item 2 (Marine protected area (MPA) regulation change petitions evaluation process) of the July 17-18 Marine Resources Committee meeting.

Support for the Petition Binning Outcome and Transparent Process

We would like to first extend our sincere gratitude to CDFW staff for publishing the draft binning document far in advance of the July MRC meeting. Access to materials far in advance supports public engagement and promotes equity by allowing ample time for review and preparation. We appreciate the transparency in presenting the justifications for the Bin 1 petitions as well as the initial assessment of the Bin 2 petitions. This openness is crucial for maintaining public trust and ensuring that all stakeholders have a clear understanding of the decision-making process. Overall, we are in general agreement with the current binning outcomes for the MPA petitions. The criteria used to classify the petitions are thorough and well-founded. Specifically, we support the inclusion of certain Bin 1 petitions that align with the objectives of the MLPA and the goals of maintaining and enhancing marine protections across the Network.

Petition Evaluation Must be Rooted in Science

We firmly believe that the scientific merit of a petition should be the primary factor in its evaluation, regardless of whether the petition is considered controversial. As both CDFW and FGC have previously emphasized, modifications to the network should be scientifically driven. We are wary of using controversy as a key metric for evaluating petitions and urge that the weight of this particular criterion be reconsidered and that the focus of petition evaluation be concentrated on scientific rigor and broad community engagement. It is essential that modifications to the MPA Network are grounded in robust scientific evaluation and driven by data that reflect the current and anticipated future conditions of our oceans. This will require consideration of both local and regionally relevant data and forecasts. Equally important is the incorporation of community input, as local stakeholders offer invaluable perspectives and knowledge that can enhance the effectiveness and acceptance of management decisions.

As we have stated in prior communication, **our organizations strongly oppose any proposals that would weaken the MPA Network** including: 1) Petition 2023-14MPA by David Goldberg of the California Sea Urchin Commission to llow to allow commercial take of sea urchins in 9 SMCAs, 2) Petition 2023-15MPA by Blake Hermann to reclassify three SMRs in the northern Channel Islands, Santa Barbara County, as SMCAs and allow either the limited take of highly migratory species and possession of coastal pelagic species, or allow the take of pelagic finfish, and 3) Petition 2023-16MPA by Richard Ogg to reclassify Stewarts Point and Bodega Head SMRs and SMCAs to allow commercial take of salmon by trolling.

Petitions that would result in a net loss of protection should not be considered, as they contradict the foundational principles of the MLPA. Given the limited time and resources available for the adaptive management process, it is essential to prioritize petitions that strengthen or maintain the network rather than those that would undermine it. We would like to affirm statements made by President Murray and Commissioner Sklar during previous FGC MRC meetings regarding the policy direction of ensuring no net weakening of the MPA Network as a result of this petition process.

Petition Evaluation Must be Prompt and Consider Numerous Threats

The adaptive management process must consider historical, scientific, and future contexts. While historical context is important, it is critical to acknowledge that our oceans are undergoing significant changes and to acknowledge the communities absent from the initial implementation of the MLPA. Adapting to these changes and including diverse voices is critical and consistent with the goals of the MLPA. From a scientific perspective, petition evaluation must account for numerous threats to ocean health, particularly the climate crisis. Rising ocean temperatures, acidification, and other climate-related threats are putting unprecedented pressure on our marine ecosystems. Due to these pressing and immediate stressors, we need to examine the current network with respect to its resilience to climate change and ensure that changes to its design help to enhance both climate and ecological resilience. It would also be prudent to move forward with necessary adaptive management changes within a reasonable time frame. **We urge CDFW to complete the Bin 1 review promptly and proceed to the evaluation of Bin 2 petitions without delay.**

Questions for the Marine Resources Committee

We have several questions that may need further discussion outside this letter but are critical for understanding the overall petition evaluation process:

- What does obtaining additional policy guidance entail?
- How would clarification from petitioners help inform the decision-making process?
- While we recognize that Bin 1 petitions are those that can be evaluated in the near term and meet specific criteria, it appears that only petitions likely to be approved were included. Why were certain petitions that could be simple denials not included in Bin 1?
- When will updates be provided regarding the information gathered about Bin 2 petitions?
- What is the timeline for decisions on Bin 1 petitions?

In conclusion, we once again stress the urgency of completing the Bin 1 petition review and moving forward to the Bin 2 petition evaluation. The health of our marine environments cannot afford delays. We sincerely thank the FGC and CDFW for their continued dedication to the protection and management of California's MPA Network. The adaptive management of our MPAs is more critical than ever, especially in the face of the escalating climate crisis. Adaptive management allows us to respond to these changes in real-time, ensuring that our MPAs can continue to provide vital ecological, economic, and social benefits. We again thank you for this opportunity to comment and look forward to discussing the MPA petition binning outcomes at the upcoming July MRC meeting.

Sincerely,

Emily Parker
Coastal and Marine Scientist
Heal the Bay

Rikki Eriksen, PhD
Marine Spatial Ecologist
California Marine Sanctuary Foundation

Laura Deehan
State Director
Environment California

Angela Kemsley
Director of Conservation Impact
WILDCOAST

Ashley Eagle-Gibbs, Esq.
Executive Director
Environmental Action Committee of West Marin

Sandy Aylesworth
Director, Pacific Initiative
Natural Resources Defense Council

Anupa Asokan
Founder and Director
Fish On

Tomas Valadez
CA Policy Associate
Azul

Ray Hiemstra
Associate Director
Orange County Coastkeeper

Laura Walsh
California Policy Manager
Surfrider Foundation

From: Bryant Irawan <[redacted]>
Sent: Monday, July 15, 2024 11:12 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Against 2023-15MPA

Hi FGC,

I am a Santa Cruz resident who often dives in the Channel Islands and want to express my disagreement with the proposal.

Opening up these Marine Protected Areas (MPAs) to limited take, particularly of pelagic finfish and highly migratory species, could have significant environmental consequences. Pelagic species like tuna, swordfish, and marlin play critical roles in marine ecosystems, and allowing their targeted fishing within the MPAs could disrupt their populations and ecosystem dynamics. This highlights the importance of maintaining strict protections within MPAs to safeguard pelagic species and preserve marine biodiversity.

Enforcing fishing regulations within remote MPAs, such as those proposed for modification, presents significant challenges that will be **impossible to overcome**. The vast distance from the mainland makes monitoring for the type of fishing being conducted in an MPA impossible. By the time illegal fishing activity is detected, reaching the remote location and confirming the violation would be logistically complex and time-consuming. Illegal parties would be able to have plenty of time to switch fishing methods or flee. This highlights the impracticality of enforcing regulations in such remote and inaccessible marine environments, underscoring the importance of maintaining robust protections within MPAs to deter illegal fishing activities.

Thanks,
Bryant Irawan

From: jasonma <[redacted]>
Sent: Monday, July 15, 2024 01:00 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Fisherman against 2023-15MPA

Hi FGC,

I'm Jason and I'm a recreational fisherman from Ventura. I'd like to voice my opinion against the proposal.

Opening up MPAs to fishing contradicts the primary conservation goals for which they were established. The original intentions behind creating these MPAs were to protect and conserve local non-pelagic species and their habitats. Allowing fishing activities within these areas undermines these conservation efforts and compromises the effectiveness of the MPAs in safeguarding marine biodiversity. While the proposal argues that Highly Migratory Species (HMS) and Coastal Pelagic Species (CPS) were not explicitly referenced in the original declaration of these MPAs, it fails to acknowledge severely declining fishing levels and habitat conditions since the MPA's inception. Over the years, fishing pressure and habitat loss have intensified, necessitating the continuation of strict protections within MPAs to safeguard marine biodiversity.

Thank you for your time,
Jason

From: Rhett B <[redacted]>
Sent: Tuesday, July 16, 2024 08:00 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Against petition 2023-15MPA

Hi FGC,

I'm Rhett and I'm a scuba diver from the LA area.

I'd like to write against the petition.

The petition fails to provide adequate scientific justification for the proposed changes. While it argues that limited take of pelagic species significantly impact the MPA ecosystems, it lacks concrete evidence to support this claim. The proposal merely suggests that the impact of fishing on pelagic and highly migratory species (HMS) within MPAs is negligible due to their wide-ranging movements, this assertion relies on inference rather than scientific evidence. Moreover, based on the proposal's own inference, fishermen can already target pelagic and HMS species outside of the MPAs.

Best,
Rhett

From: Blake Hermann <[redacted]>
Sent: Tuesday, October 15, 2024 08:14 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Ashcraft, Susan@FGC <[redacted]>; Wertz, Stephen@Wildlife <[redacted]>; Shuman, Craig@Wildlife <[redacted]>
Subject: Petition2023-15MPA Clarification/Amendment Letter

Hello all,

See attached comment letter containing an update, stakeholder feedback responses, and amendments regarding the petition I submitted requesting allowing limited-take HMS or pelagic fisheries in 3 Channel Islands MPAs.This can be attached at the next FGC, MRC, or both meetings, wherever it is more applicable. This has also been sent to federal staff at NMFS, CINMS, and PFMC to keep everyone involved with this petition's process updated and up to date.

Thank you,

Blake Hermann

Clarification and Amendments Regarding Petition2023-15MPA

Dear Fish and Game Commission, CDFW, CINMS and PFMC staff,

This comment letter serves as an amendment, update, and reply for those interested regarding this Petition2023-15's requesting a change in take access in 3 MPAs at the Channel Islands State/Federal MPA network.

I would first like to thank CDFW, for completing the binning phases of the petition process, and the FGC, and MRC for their supportive efforts in this first-time evaluation process. Nearing a year following public submittal there has been much feedback regarding this petition, both positive and negative in nature, from the public, and both state and federal bodies. This letter will act as a supplemental add-on to the original petition, further clarifying examples that were perhaps not explained well enough by providing some additional stakeholder rationale, input and answers to a some concerns the have been raised. Additionally, this letter contains a few amendments regarding the original petition.

Several discussions with groups or individuals coming from commercial, recreational, conversationalist, and environmental sectors concerning the petition have continued outside of official meetings. More has certainly come to light after submittal that, as the petitioner, I feel should be acknowledged when decisions are finally made.

Commercial Swordfish:

One of the largest conflicts that comes up with the three mentioned Channel Islands MPAs and the commercial swordfish fishery is the 3 MPA's current no-take allowance, which includes the retrieval of legally taken fish.

The harpoon swordfish fishery takes a swordfish by locating a basking fish on the surface and attempting to hit it with a hand thrust harpoon. Once hit, fish are left to tire on a set of gear marked with a flag, if not immediately retrievable. This soak time varies greatly, from 1-8 hours, but it is typically no longer than 2 or 3 hours. In that time, fish could pull gear several miles, 1-5 on average in my experience participating in the fishery. This movement occasionally brings gear into an MPA before being retrievable. Even if fish are taken miles away, there is still a random chance the legally taken fish on harpoon gear ends up inside the closure come retrieval time. There is nothing we can do to stop a swordfish from swimming where it wants to go while on gear.

Similarly, federally authorized deep-set-buoy-gear (DSBG) sets 10 flags with 10 hooks at 1000ft in open waters for swordfish. Swordfish hooked with this method can move gear similarly to harpoon fish in terms of distance. This is because if a hooked fish does not come to the boat immediately, it normally does not, the gear is placed back in the water to let the fish tire and to monitor the remaining set, leaving legally hooked fish the possibility to move into a closure as well.

Both of these problems are more prevalent around the Channel Islands and the three MPAs mentioned in 2023-15MPA because these MPAs extend an additional 3nm offshore into federal waters, overlapping more with the more offshore swordfish-fishery grounds. Today, retrieving a

dead harpoon fish or fighting/retrieving a hooked fish inside these no-take closures is illegal, something I believe must be resolved some way. This is especially the case for harpoon fish, as unlike DSBG fish that could be cutoff or released with a tag, harpoon fish cannot be let go once hit.

This problem is compounded in the commercial swordfish fishery due to the fishery's reliance on calm waters to eyeball or locate a basking swordfish. Of the northern Channel Islands one MPAs in particular, The Footprint, sits in the lee of the islands, the place where the islands act as a physical weather barrier from the normal westerly wind and swell. This calm section was historically important and remains an essential area to the swordfish fishery more than other fisheries because of its reliance on spotting vs hooking a fish. These weather pockets force the fishery to operate in the lee area regardless of the MPA's presence. The result is a higher effort around the MPA, not because there is any more swordfish there than other places, but because that is the only zone that has fishable conditions most days at the Northern Channel Islands. This closer proximity to the MPA due to weather leads to higher chances of interactions where legally taken fish tow gear into the closures as mentioned above. We can see this higher landing rate and therefore higher chance of interactions by observing commercial block catch data showing the blocks containing and surrounding the Footprint, blocks 707 and 708 are especially productive due to the calmer waters. These two blocks alone captured 2.82% of state swordfish landings, locally comprising 15.63% of the swordfish produced by the Santa Barbara Port Area over the last 18 years (MFDE[1]), particularly high values for an HMS.

It is understandable that opening these MPAs simply on the idea that the weather is better than other zones is not a valid reason on its own, but that is not the point. The point is that this calm zone, and the higher effort inside of it, results in higher chances of gear unintentionally moving into the closure. This unique combination of factors gives even more reason to resolve this problem now during this adaptive management process.

As a result, the FGC, CDFW, PFMC, and CINMS should take this interaction into account in order to better consider the individual actions for allowing the harpoon and federal DSBG fishery to operate in or, at the very least retrieve, legally taken swordfish within the 3 requested MPAs because of this gear movement problem. An option can be amended and added onto the original petition if required, but as harpoon and DSBG were included in the original request for allowable methods of take, the individual actions for the gears in each of the three requested MPAs should already exist.

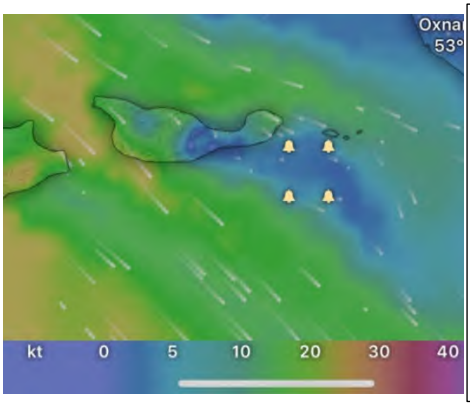


Image depicting average day in the Northern Channel Islands with The Footprint MPA outlined. Displayed wind "lee" for commercial swordfish is predominately around the closure forcing effort and gear interactions with the MPA to be higher (conditions are "fishable" under 10kts, blue color).

Wind model used in the NOAA HRRR model mid-day (12:00) during peak effort time.

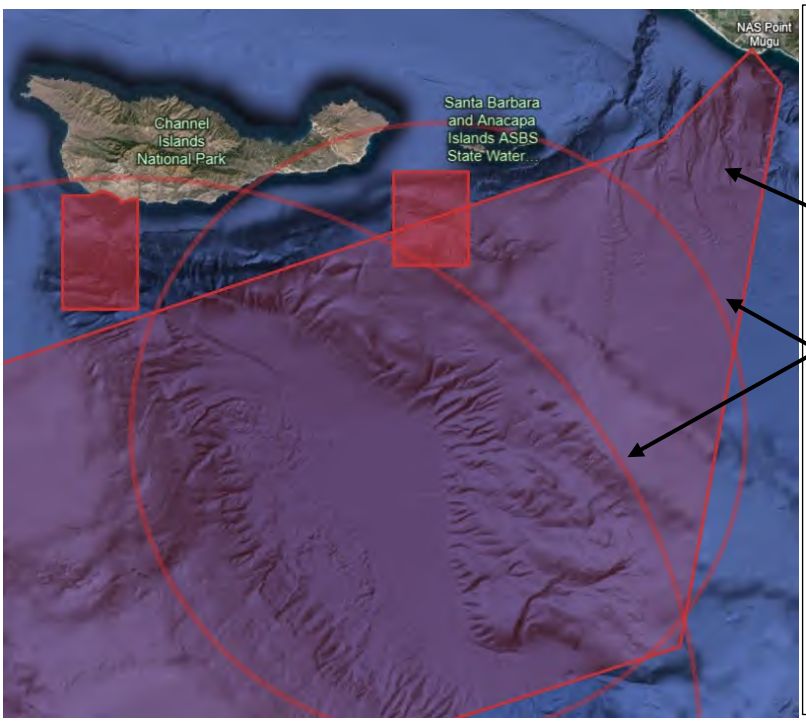
1. MFDE under only swordfish landings from 1/1/2008 to 12/31/2023. The Santa Barbara Port Area was used for the local filters to include Ports around the Channel Islands (petition's area of concern).

Local Naval Closures:

From my talks with general HMS fishermen at as many talks as I could attend locally, the issue of military operations off the southern side of the 4 northern Channel Islands was brought up enough time to look into and warrant discussion. The primary argument brought up is, while HMS cover large areas and are fishable outside of the MPAs, military operations close off most and sometimes all fishable area for HMS around the Channel Islands around the northern Channel Islands for local fleets except small areas largely taken up by the two existing MPAs, The Footprint and Gull Island.

While on the water targeting HMS, I have removed from and forced into a different area where no or less HMS are realistically present (more inshore, into foul weather, or into an MPA). There are two types of naval closures on the southern side of the Channel Islands, total range closures and radius closures. Some days one or the other is active and some days both are active depending on the exercise. The location of closure radiuses from operations does vary, but the missile range closure is constant polygon. This zone covers a large area of offshore waters on the southern side of the islands, where HMS effort locally occurs. Included is an image of the points provided to me by the Naval Warfare Center Pt. Mugu depicting the range closure when they are in a live fire event, shaded in light red. The hollow circles depict radius closures from boat coordinates and restricted distances from said positions are enforced by aircraft. Note, a 1.5 nm corridor from land was still permitted for basic transit, so closures did not go all the way to the island shore. The Footprint and Gull Island MPAs have also been included depicting which areas fall inside and outside the missile range.

Event frequency does vary from 0 to 6 days a week, and closure radiuses from boats change based on the activity and number of vessels participating. Currently the only way of acquiring event data is with direct talks with Naval officers <24hr before an event, and in some cases the day of on the radio.



Naval closures at the Northern Channel Islands overlaid with The Footprint and Gull Island MPAs.

The Point Mugu Naval Missile Range closure is the entire light red shaded area.

The two circles are closed radii from vessels operating in the same area, radii closures did leave a 1.5 nm corridor open from the island.

Adaptive Management, the MLPA, and the Master Plans:

A general comment of concern has been that the petition attempts to reduce protections of the network, does not align with adaptive management, the MLPA, or MPA Master Plans and should be rejected.

Adaptive Management: It should be noted that the adaptive management of the MPA Network is not a one-way street. Adaptive management is defined by Fish and Game Code section 2852(a)[2] as, "a management policy that seeks to improve management of biological resources, particularly in areas of scientific uncertainty, by viewing program actions as tools for learning…" It is a practice where, as conditions change or we learn more about something, in this case the MPA network, we actively amend management regulations to reflect what currently is known to be a reasonable management method. That being said, consistently increasing protected areas or the level of protection for all species in an area every management cycle is not the only direction this process is allowed to go in order to manage the network. If sufficient evidence is provided and goals can still be met, adaptive management can certainly be used to decrease restrictions in cases where we still accomplish the same goals, something Petition2023-15MPA claims is possible due to the lack of or how little pelagic/HMS interactions are with MPA goals. If we can still accomplish the stated goals of the network in these specific MPAs while allowing some take of HMS or pelagic species, the network can certainly still be considered improved as a result. The latest example of adaptive management lowering regulation was the repealing of the Cowcod Conservation Areas (CCAs) and implementation of the smaller Groundfish Exclusion Areas (GEAs) after the cowcod population was considered rebuilt and healthy.

The MLPA: The goals of the MLPA and accompanying plans are clear. The largest goal being to preserve local ecosystems, allowing them to grow undisturbed as much as possible by people, resulting in higher levels in local species' abundance and biodiversity for future generations to observe. From the onset of this petition, it has been a foundational idea that allowing take of pelagic or HMS inside these areas will both, not significantly affect local species abundance or populations, as they would still be protected, and that the HMS populations would not be significantly affected by such a change. The argument of lowering protections in a petition like this is understood at face value, but the goal of the petition is to examine if we can accomplish the same or a satisfactory level of the stated goals under these lower protections, and if this is indeed the case, how lower are these protections in reality?

MPA Master Plans: Appendix G of the 2008 Master Plan[3] discusses the idea of species affected by MPAs, mentioning pelagic and HMS groups are overall less affected. Additionally, as the original petition mentions, the current 2016 MPA Master Plan for the southern section outlines within its goals[4] that areas of protection providing limited pelagic take or HMS take be provided. This is something we do not see around the Channel Islands in nearly comparable amounts to the rest of the state network, this effect is worsened by the federal expansions at the Channel Islands encroaching more into offshore waters where more pelagic fishing occurs. Previous FGC MPA discussions provided additional input on MPAs and HMS interactions where the commission stated that MPAs are intended to protect (local) ecosystems, not individual species, especially those that are highly mobile or pelagic[5]. Both FGC comments, and statements from the 2008 and 2016 Master

2. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=2852.
3. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=113013&inline#:~:text=Species%20with%20a%20strong%20tendency,their%20entire%20range%20of%20movement.
4. http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=112492&inline (pg. F-5 (Goal 2, specifically point 4))
5. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=207757&inline (pg. 9)

Plans support the idea that HMS are both not as affected by these MPAs and that areas allowing take of just HMS be included in the network.

All of the above evidence and precedent came to light after the establishment of the Channel Islands network in 2002, so it is somewhat understandable why the decisions were made back then to leave these areas as no-take zones, we simply did not know as much then as we do now. However, 20 years later with all of this more modern evidence and precedent elsewhere in the 40% of the coastal network that is limited take, it is justifiable to reevaluate the Channel Islands Network and adaptively manage it to our current scientific understanding for pelagic/HMS allowed areas.

Kelp Restoration and Climate Resiliency:

A final comment of concerns mentions granting limited take access to these areas for Pelagic finfish or HMS will negatively impact local species such as groundfish or those important to kelp restoration and therefore climate resiliency, including but not limited to sheepshead and spiny lobster.

The preferred option of only allowing take of HMS was preferred with species interactions specifically in mind. The more selective list of HMS avoids pelagic finfish species, like yellowtail, that could be targeted with methods that are more likely to interfere with non-pelagic species (weighted, bottom contact dropper loops). HMS effort for tuna or billfish consists primarily of surface casting a jig/bait, trolling baits on the surface, or fishing in the middle of the water column. It is very unlikely those targeting HMS species this way will have many interactions with non-pelagic species such as groundfish. Additionally, pelagic or HMS fishing is done primarily offshore, away from nearshore kelp ecosystems, and away from nearshore areas spiny lobster and sheepshead frequent.

Included in the original petition was an additional option and sub-option for only “surface fishing methods” and nearshore closures respectively. If the preferred option of full water column access with no nearshore closures is still seen as concerning even with its limited interactions with non-HMS, the water column limiting option and/or nearshore closure sub-option can certainly be used.

Water Column Limited Fisheries (Amendment):

Since submittal, talks with officials revealed rather than using surface fishing methods as the allowed take reason, simply aligning with existing closures such as the GEAs and using rather the restriction of “bottom contact gears” will be better applicable. The new term, “bottom-contact-hook-and-line,” would need to be defined in state codes (along with bottom contact gears) to avoid hook-and-line bottom usage as hook-and-line on its own is not a bottom contact fishery per the only existing federal definitions of bottom contact gears. Restriction of bottom contact gears and additional restriction of bottom-contact-hook-and-line would allow for more selective take of HMS, not affect HMS effort significantly, and better protect local non-HMS from incidental catch. Therefore, it is proposed that the petitions options be slightly amended to allow hook-and-line except that of bottom-contact-hook-and-line, and restrict bottom contact gears, vs in the original petition where the allowing surface fishing methods was mentioned in the options.

Due to the regulatory complexity of this change, new definitions, and more complex gear explanations, it is still the petitioner preference to <u>not</u> restrict take to water column specific

variants of hook-and-line (options 3 and 4 in the petition) but the choice will still remain if the department prefers it for other reasons.

Nearshore Closures (Amendment):

In the original petition there was also the sub-option to include nearshore MPAs at two of the three MPAs mentioned, Gull Island and Santa Barbara Island. The Footprint MPA did not include nearshore option as no section of The Footprint is attached to land or is nearshore. My personal petitioner preference of these nearshore choices is still that they are not needed if the preferred Option 2 is selected, but the choice is there if desired. It has been raised that the original nearshore closure boarder for the Santa Barbara Island MPA in the original petition used the island's 1 nautical mile radius line. This line is not straight, could lead to confusion, and does not align with MPA design criteria of the MLPA (no curves or odd shapes). Therefore, it is now proposed to use a straight line like what is used for all current nearshore closures rather than the original 1 nm line. The coordinates for this line separating the nearshore and offshore regions at Santa Barbara Island MPA will now be the following:

A straight line from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W

The choice to make the nearshore closures either stricter in take allowances or into nearshore no-take areas remains the same. Of the two sub-options, the more-strict limited-take choice is still preferred over a no-take area if nearshore MPAs are implemented. For the possible nearshore limited-take region, feedback and an oversight on my own part (leaving out spear) has led to a rework and amendment of the proposed nearshore MPAs allowable methods of take. See amended Table 2, the Table from the original petition, below (red = new language ~~cross~~ = removed language).

Table 2: Proposed Coordinates and options for the Nearshore limited or no take areas for Gull Island and Santa Barbara Island (Amended)	
Gull Island Nearshore MPA	Santa Barbara Island Nearshore MPA
The nearshore-offshore boarder would be bound by a straight line running from 33° 58.000' N. lat. 119° 53.000' W. long, to 33° 55.800' N. lat. 119° 48.000' W. long. within the existing MPA. Regulation within nearshore area: ~~Recreational and commercial take of (pelagic finfish or HMS, depending on the state's choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred).~~ The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spear is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed. (Only needed if HMS option is selected) Or A no-take region (not preferred)	~~The 1nm boundary of SBI within the current MPA~~ The nearshore-offshore boarder would be bound by a straight line running from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W within the existing MPA. Regulation within nearshore area: ~~Recreational and commercial take of (pelagic finfish or HMS, depending on the state's choice) is allowed via surface casting, kite fishing, and surface trolling. The commercial take of swordfish by harpoon is allowed. (preferred).~~ The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spear is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed. (Only needed if HMS option is selected) Or A no-take region (not preferred)

The proposed nearshore regions would now only allow take by easily enforceable, selective, non-hook-and-line methods. Recreational spear of pelagic finfish or HMS, and commercial harpoon swordfish are easily recognizable, completely selective in their methods of take, and offer zero bycatch. The methods would make the more non-pelagic prevalent nearshore regions simple to enforce and significantly mitigate any impacts on non-pelagic species if there are concerns with allowing hook-and-line methods nearshore.

Clarification and Amendment Review:

Clarification: Uncontrollable gear movement of commercial swordfish fisheries (Harpoon and DSBG) poses a problem with existing MPAs, namely those in the original petition due to their offshore expansion into federal waters creating more of an overlap with offshore pelagic/HMS fisheries. Individual actions concerning these methods allowance should be more strongly considered because of this problem and some solution should be reached.

Clarification: Large, periodic naval closures offshore restrict most HMS/pelagic fishing areas local to the southern parts of the Channel Islands when active, increasing congestion of both recreational and commercial fisheries toward the open areas just outside of the MPAs.

Clarification: Petition does in fact conform to the goals of adaptive management per its established definitions, has goals aligned by the MLPA, and both Master Plans outline goals concerning allowable pelagic or HMS take and lack of MPA effects on pelagic and HMS.

Amendment: To better conform to existing federal regulations and to make enforcement easier, the mention of "allowance of surface fishing methods" in Options 3 and 4 of the original petition will be replaced with "restriction of bottom contact gears." Due to regulatory complexity the restriction of bottom-contact-gears in options 3 and 4, it is still not preferred by the petitioner but is still listed as a choice for the department to pick if desired. Option 2 followed by 1 are still the first and second preference. Bottom contact gears would need to be defined in state regulation as a specific list of gear types/configurations as well as bottom-contact-hook-and-line. The original 2 unamended options and 2 amended options would read:

Option 1 (unchanged): **(Petitioner's 2nd Preferred Option)**

- The recreational take of pelagic finfish is allowed.
- The commercial take of pelagic finfish by hook-and-line and swordfish by harpoon is allowed.
- The use of Deep-Set-Buoy-Gear (DSBG) is allowed in federal waters (federal consideration only)

Option 2 (unchanged): **(Petitioner's 1st Preferred Option)**

- The recreational take of highly migratory species is allowed.
- The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed.
- The possession of coastal pelagic species is allowed.
- The use of Deep-Set-Buoy-Gear (DSBG) is allowed in federal waters (federal consideration only)

Option 3 (amended): **(Petitioner's 4th Preferred Option)**

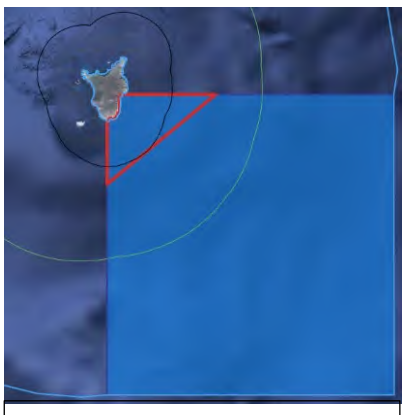
- The recreational take of pelagic finfish is allowed, except through the use of bottom-contact-hook-and-line and bottom contact gears which is restricted.
- The commercial take of pelagic finfish by hook-and-line and swordfish by harpoon is allowed, except through the use of bottom-contact-hook-and-line and bottom contact gears which is restricted.

Option 4 (amended): **(Petitioner's 3rd Preferred Option)**

- The recreational take of highly migratory species is allowed, except through the use of bottom contact hook-and-line and bottom contact gears which is restricted.
- The commercial take of highly migratory species by hook-and-line and swordfish by harpoon is allowed, except through the use of bottom-contact-hook-and-line and bottom contact gears which is restricted.
- The possession of coastal pelagic species is allowed.

Amendment: To align the proposed nearshore closure of Santa Barbara Island MPA to the required MPA design criteria outlined in the MLPA, the removal of the 1nm line for the proposed nearshore/offshore boarder is replaced with the aforementioned straight line running from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W to separate a possible nearshore/offshore State MPA.

Old – Non MLPA conforming



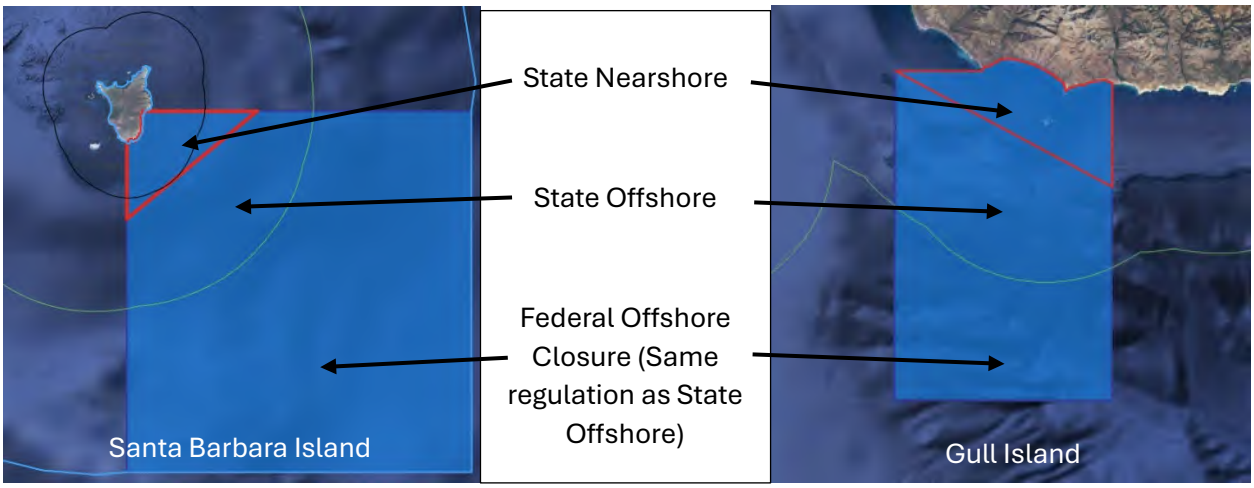
New – Conforms to MLPA design criteria for MPAs

Methods of take in the nearshore regions has also been amended. See the final amended version of table 2 below.

Table 2: Proposed Coordinates and options for the Nearshore limited or no take areas for Gull Island and Santa Barbara Island (Amended)	
Gull Island Nearshore MPA	Santa Barbara Island Nearshore MPA
The nearshore-offshore boarder would be bound by a straight line running from 33° 58.000' N. lat. 119° 53.000' W. long, to 33° 55.800' N. lat. 119° 48.000' W. long. within the existing MPA.	The nearshore-offshore boarder would be bound by a straight line running from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W within the existing MPA.

Regulation within nearshore area: The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spear is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed*. (*Only needed if HMS option is selected) (Preferred) Or A no-take region (not preferred)	Regulation within nearshore area: The recreational take of (either Pelagic Finfish or Highly Migratory Species (option dependent)) by spear is allowed. The commercial take of swordfish by harpoon is allowed. The possession of Coastal Pelagic Species is allowed*. (*Only needed if HMS option is selected) (Preferred) Or A no-take region (not preferred)

The overall configuration of a possible nearshore/offshore system would involve a nearshore State MPA, an offshore State MPA, and a Federal offshore MPA with the same regulations as the State offshore MPA (DSBG is the exception, being a federally exclusive choice). The nearshore/offshore closure option adds an extra layer of complexity to the system and is not preferred in general, but this amended option would be the best fit if a nearshore region was desired. Below are generated images of possible nearshore/offshore state/federal configurations in the petition.



As of now those are the answers to most of the feedback received, new information that has come to light, and amendments to the original petition.

Thank you,
Blake Hermann
Petitioner (2023-15MPA)

From: Nathan Perez <[redacted]>
Sent: Wednesday, October 23, 2024 10:06 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Mlpa

Nathan Perez
Captain F/V Bear Flag 2
Ph: [redacted]
E: [redacted]

Hello,

My name is Nathan Perez, I participate in the commercial swordfish fishery in Southern California operating FV Bear Flag 2 and participating in the swordfish fishery for over 15 years. I am emailing today to voice my support for Petition 15MPA and call to deny or modify petition 34.

Petition 34 should be disallowed or at the very minimum allow for harpoon swordfish still inside the Farnsworth as it is just as enforceable as recreational spear.

For petition 15, allowing Highly Migratory Species limited take, especially harpoon swordfish and deep-set buoy gear, for commercial fisheries is something we can allow inside of these areas. Allowing this will still protect the nonpelagic fish that benefit more from these areas. Swordfish and other migratory fish do not benefit or provide significant benefits to these areas as they simply pass through, and there is no reason a harpoon boat should be restricted from taking a fish inside of these areas while a longline boat can operate in its entire grounds outside the EEZ, targeting the same fish I will find in the summer when the fish are coastal vs the winter/spring when they are in the longline grounds. These MPAs at the Channel Islands also expand federal and further overlap with our offshore fishery.

The proposed allowable methods for commercial swordfish are highly selective, for harpoon it is 100%, and both harpoon and buoy gear are the most sustainable methods we have for targeting swordfish. Granting selective access to these areas will also allow us to not worry about harpooned or hooked buoy fish swimming gear into the no-take areas which always seems to happen and cause an issue related to retrieving that legally taken fish. This is a problem made worse by these three areas expanding into federal water vs other MPAs that stay more nearshore, away from most swordfish grounds. We occasionally avoid looking in sections of legal water because we know if we hit a fish there the current that day will take it into the closure. That is not fair.

At a time when commercial swordfish is dying due to nets being removed and harpooners and buoy guys having to compete with international longliners and nets from other countries selling cheep fish here locally we need these areas back to be able to keep our clean, and domestic swordfish markets in operation.

Thank you,

Nathan Perez (FV Bear Flag 2)

From: Steve Weiser <[redacted]>
Sent: Friday, November 8, 2024 07:48 AM
To: FGC <FGC@fgc.ca.gov>
Subject: Mpa closure

My name is Steve Weiser, I run the FV Diva out of the Channel Islands as a harpoon swordfish boat with over 20 years of experience in the fishery. I am emailing today to voice my and my Crew's support of Petition2023-15MPA and lack of support for petition2023-34MPA concerning the possible allowance of harpoon swordfish in a few of the Channel Islands MPAs and closing of the Farnsworth SMCA to everything but recreational spearguns.

We currently have to avoid even open areas surrounding the closures because we worry risking that we hit a fish with a dart in legal water that then swims on the gear into the closure where it becomes illegal to retrieve. This problem is made worse because the Channel Islands MPAs go to 6 miles instead of 3, overlapping more of our offshore fishery. Unlike hook fisheries, a harpoon fish cannot be let go, it is a waste to not be able to retrieve a legally hit fish, so I and the rest of the fleet intentionally go further around the boarders when I am fishing to give my hit fish room before possibly moving into the closure. I see the petition asks for other allowances besides harpoon swordfish but at the bare minimum harpoon should be allowed for this gear drift reason, it is a unique case.

Harpoon swordfish is the cleanest method we have for swordfish in the state and after nets are gone, will be only one of the two remaining ways these fish can be commercially targeted along with DSBG. These closures around the islands do little to nothing for swordfish nor does the swordfish have a massive impact on the small ecosystems these MPAs are trying to conserve. Allowing take with harpoon will not affect any of your stated goals for MPAs being meant for more abundance or biodiversity as the fishery takes so little compared to others fished internationally on the same stock of fish as they travel the eastern Pacific Ocean. Additionally, your Master Plan for MPAs specially asks for areas that allow pelagic or highly migratory species to be targeted like swordfish. We do not see any of these areas around the Channel Islands in any place pelagic fish even are. Over 90% of these islands is outright no-take and the two pelagic areas are on the northern side of the islands above Anacapa and Santa Cruz islands, opposite of the warm water southern side where pelagic species actually are.

These areas on the south or the islands are not any better than anywhere else for swordfish or other HMS on the southern side of the islands, the fish follow the current and the breaks, plain and simple. Some days they will be in there, some days they will not be,but having the option to look in there should be considered as these areas are doing nothing for the

fishery as “spillover” is not a thing for species that travel many time the distance of an MPA per day.

In regard to petition2023-34MPA, I personally believe that the petition should just be rejected because pelagic species, which hare the only species you can take in the Farnsworth besides seabass, are not affecting that area or its local ecosystems like a fish that lives in there protected forever. Any argument that it is an enforcement problem can just be seen in the other half of the MPAs that are limited take zones and have perfect enforcement. What makes Farnsworth different from these other areas? Nothing. Now, if there really was an enforcement problem, which I do not believe there is, enforcing recreational spear is probably more difficult that enforcing commercial harpoon swordfish which is currently allowed in the Farnsworth and should still be allowed regardless of any modification made to the area. Petition 34’s final result should be its dismissal or, at the at the very least, still allowing harpoon swordfish with spear as that is simply the commercial equivalent and just as enforceable.

Thank you,

Steve Weiser and Don Gillispie
F/V Diva

Woodland Construction
23622 Calabasas RD #337
Calabasas, CA 91302
[redacted]

From: Blake Hermann <[redacted]>
Sent: Wednesday, February 26, 2025 08:17 AM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC [redacted];
Shuman, Craig@Wildlife [redacted]
Subject: Comment on Bin 2 MPA Petition evaluation process

Hello all,

See attached comment letter requesting and supporting previous comments that petition be evaluated under the MPA Master Plan(s), most notably the guiding regional objectives under the MLPA goals from the Master Plans.
Letter additionally breaks down the Master Plan's objectives in the scope of Petition2023-15MPA specifically, highlighting why petition should be considered. This is
all referencing the most recent revised version of the petition submitted in January.

Thank you,

Blake Hermann

Petitioner - Petition2023-15MPA

Guiding the Petition process through the MPA Master Plan's Regional Objectives under the MLPA Goals, and Petition2023-15MPA's support under said Goals and Objectives

To the FGC and MRC,

The adaptive management process of the MPA network through the petition process has been an all encompassing process stretching nearly two years and has consisted of many meetings with stakeholders from a multitude of backgrounds across the State.

Currently, several stakeholders have differing views on and are determining under what venues to discuss bin 2 petitions. Personally, I do not mind MRC or full commission discussions, but do see benefits to possibly holding discussions at both. This way we could benefit from the more casual open floor of the MRC and still keep all commissioners involved and informed on these petitions to gain the best final actions on these petitions from the full commission.

That being said, one commonality throughout this process from all groups has been the calling for the analysis process to be explicitly guided by the existing MPA Master Plan's (MMP) adaptive management process. This calling has come from all sides, from recreational and commercial fishing organizations such as AllWaters, CFSB, CCA, and the American Sportfishing Anglers (ASA), to environmental NGOs like Azul, Environment California, Environmental Defence Center, the NRDC, and WILDCOAST. The ladder eNGOs were among 17 groups who jointly signed and sent a letter to the FGC explicitly stating to guide the process through the MMP and its objectives in January.

The MMPs are a framework that guides the adaptive management process of the MPAs as that was part of their original intention. The process guided by the MMP lays out a clear analysis path through lists of "objectives" that fall under the six broader goals of the MLPA. These objectives under the six MLPA goals are what the MMP uses to determine if an MLPA goal is met, as the objectives are, "more specific and measurable than the broader MLPA goals," according to the MMP. In order to best determine if an MLPA goal is met, we look at these objectives stated under the regional MMP and determine if the objective is satisfied using the best available science/data. This process is laid out in Chapter 4.5 of the 2016 MMP, and the measurable objectives under each MLPA goal can be found in the regional appendices (C-F) in the suitably named "Regional Goals and Objectives" sections of the MMP.

I would not only like to echo all comments from both sides of the aisle to guide the process through the MMP(s) and their objectives, but to also bring up that Petition2023-15MPA is one of, if not, the only petition with explicitly stated support in the MMP objectives (see Goal 2 Objective 4 (2.4) below). This stated support of Petition2023-15MPA is laid out by not only the more-modern 2016 MMP, but even the original MMP from 2008, showing a historic, scientifically based rationale for Petition2023-15MPA, that came after the designation of the Northern Channel Islands Network. This shows our obligation to update this pre-MMP island network to modern standards we see in our coastal network that better follows these underlining MMP objectives.

The remaining sections of this document will go through all of the six goals of the MLPA (bold), the guiding MMP regional objectives under each MLPA goal (numbers), and provide a breakdown response of the specific objective through the scope of Petition2023-15MPA (letters). For context, Petition2023-15MPA is requesting 3 SMRs at the Northern Channel Islands be modified to SMCAs to allow for the limited take of Highly Migratory Species (HMS) or pelagic finfish, listing a variety of different allowable gear options, 6 in total not including additional possible nearshore/offshore MPA configurations. The core rationale of the petition is, we know the benefits of MPAs on HMS/pelagic species are very low compared to the high burden certain local MPA networks, in this case the Channel Islands, place on HMS/pelagic fisheries, and that we see pelagic allowances everywhere else but not in the older Channel Islands network where pelagic allowed areas should arguably be the most prevalent.

MLPA Goal 1. To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems.

1. Protect and maintain species diversity and abundance consistent with natural fluctuations, including areas of high native species diversity and representative habitats.
    a. The three MPAs in the petition and their locations are not intrinsically unique to HMS/pelagic finfish due to their highly migratory nature. The migratory nature of these species and the vast area of water they cover shows clear evidence that any take of HMS or pelagic finfish within these MPAs will not significantly affect HMS or pelagic finfish abundance any more than what existing fishery pressure already exerts on these species outside of the MPAs. Additionally, pelagic and HMS fisheries are all offshore, open-water fisheries, and are non-bottom contact. This means any effect on representative habitats containing a diverse spread of species on bottom reefs or nearshore kelp forests will be minimal due to

fishing simply not occurring there, still protecting those species that benefit from MPAs the most.
We already see this in use outside of the Channel Islands Network in the more-modern coastal network that came under the state driven MLPA implementation process. Nearly 40% of the coastal network allows for some form of limited, mostly pelagic, take and still protects those species and habitats that benefit from the protection, the pre-MMP/MLPA Channel Islands only has 3.5%.

2. Protect areas with diverse habitat types in close proximity to each other.
    a. As the petition prefers only HMS take being allowed, the alternative being a pelagic finfish allowance, the only habitat type affected by this change will be open water. Pelagics and HMS are open water targeted species, one rarely sees billfish or tunas targeted even remotely nearshore let alone in a kelp forest or shallow reef. The unique habitats inside the three MPAs such as kelp forests or rocky reefs will see little to no change in relative level of protection. Even the bottom areas of the three MPAs, which consists of mostly empty mud flats thousands of feet deep, will see no meaningful change in its protection as nearly all HMS or pelagic effort is done at or near the surface or in the mid-water, rarely deeper than 100ft. If needed, the petition also includes options further restricting bottom contact gears outright, but again HMS and pelagic effort mostly avoids the bottom in general.

3. Protect natural size and age structure and genetic diversity of populations in representative habitats.
    a. The species that live inside these MPAs year-round that gain the most from them are nearshore species living in the shallow-nearshore sections of the MPAs, or are groundfish frequenting the bottom habitat nearshore and offshore on rocky reefs. This fact is stated in the 2008 MMP appendix G which describes what species benefit the most from MPAs and why. As these non-pelagic, local species are predominantly found in these nearshore habitats, and not in open water where HMS and pelagics are found, all of these local, non-pelagic species can expect their populations and genetic diversities to be unaffected by this change. HMS or pelagic species would of course experience some form of take; however, as previously mentioned, levels of take within these areas would not be any different from the surrounding open area and would not be in levels affecting their population structures within the MPA.

4. Protect biodiversity, natural trophic structure, and food webs in representative habitats.
    a. The amount of HMS or pelagic finfish in these areas is not expected to be significantly higher than the surrounding open area due to their migratory nature. Because of this, the overall trophic structure and food webs of the area will not be significantly affected as any interactions with these HMS or pelagic species will still be present as they move in and out of the area on the currents. The existing protections on local, non-pelagics will remain, leaving the remaining levels of the web unchanged.
    While some argue pelagic fisheries can just work around the closures, around the Channel Islands because of the higher closure rates, the federal offshore expansions, naval closures, and weather restrictions around the islands make pelagic fisheries are significantly more constricted. Allowing limited pelagic access inside these MPAs will benefit the fisheries not because they contain more pelagic or HMS, but because the added total available area is locally significant.

5. Promote recovery of natural communities from disturbances, both natural and human induced, including water quality.
    a. HMS and pelagic finfish are well managed groups of fish that are in no need of recovery. In fact, the HMS fishery is one state and federal managers are actively trying to grow due to domestic lack of participation. The water quality protections within the three Channel Islands MPAs in the petition will of course still remain even if the petition is accepted in-part or fully. Additionally the Channel Islands National Marine Sanctuary water quality regulations in the entire area in and out of the MPAs will remain in effect.

MLPA Goal 2. To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted.

1. Help protect or rebuild populations of rare, threatened, endangered, depressed, depleted, or overfished species, and the habitats and ecosystem functions upon which they rely.
    a. As mentioned under Gaol 1.5a, none of the HMS or pelagic finfish species that would be targeted in these three MPAs are rare, threatened, endangered, depressed, depleted, or overfished. The open water habitats they live inside will still have existing protections on the habitat. Currently, an overwhelming percentage of HMS consumed in this State are longline imports versus our cleaner hook-and-line fleets. Local swordfish and tuna

fishermen locally pick from the same stocks international longline fleets do, taking only a fraction of the stock and offering a superior grade of seafood both commercially and recreationally for personal consumption. Allowing access to these areas offers a way to meaningfully impact local fleets around the Channel Islands by providing them more water to cover while also not significantly impacting the HMS or pelagic stocks which are currently significantly more affected by international fisheries.

2. Sustain or increase reproduction by species likely to benefit from MPAs, with emphasis on those species identified as more likely to benefit from MPAs, and promote retention of large, mature individuals.
    a. Appendix G of the 2008 MMP breaks down, on a species level, fish that benefit from MPAs the most and fish that benefit the least. The MMP states that, species benefiting from MPAs the most are local, non-pelagic species:

    "MPAs are likely to have their greatest direct benefits on residential species. In general, MPAs offer direct protection to less mobile or sedentary species that locally aggregate in specific habitats (e.g., many of the rockfish species)." -Appendix G of the 2008 MMP

    These local, non-pelagic species would still be protected even if this petition was accepted, still allowing for these species to benefit the most from the MPAs, and retain populations of large, mature individuals. The 2008 MMP additionally states that HMS and pelagic finfish are species that receive less if any benefits from MPAs due to sheer amount of water they cover:

    "Species with a strong tendency to move will not benefit significantly from the establishment of MPAs [...] Direct benefits of MPAs are expected to be much reduced for highly migratory species (e.g., swordfish, tunas, some sharks) that likely spend relatively little time inside local coastal MPAs. Protection of these mobile species and their contributions to local marine ecosystems may best be addressed by larger-scale regulatory measures." -Appendix G of the 2008 MMP

    With the above guiding information, there is no scientifically supporting rationale to leave the three MPAs in Petition2023-15MPA completely closed to pelagics or HMS. Rather, due to the area traveled by HMS or pelagic finfish, best protective practices are seasonal restrictions, and

size/length requirements, something we already use Stateside with pelagic finfish and federally with HMS. The primary driver this petition only applies to three MPAs and not others was, unlike other no-take areas, pelagic or HMS can more than reasonably be targeted whilst meeting our protection goals in these three MPAs specifically (see Goal 2.4a below). For example, there is no reason to request pelagic or HMS access in MPAs simply too far offshore due to lack of total effort or areas too nearshore that would reasonably never offer significant amounts of pelagic or HMS opportunities because they are too shallow.

3. Sustain or increase reproduction by species likely to benefit from MPAs with emphasis on those species identified as more likely to benefit from MPAs through protection of breeding, spawning, foraging, rearing or nursery areas or other areas where species congregate.
    a. As mentioned above in Goal 2.2a those species "likely to benefit from MPAs," non-pelagics/groundfish, will continue to be protected including their breeding, spawning, foraging, rearing and nursery areas, including other areas where species congregate, kelp forests/rocky reefs. These respective habitats will also see little to no effect as pelagic or HMS fishing efforts rarely overlap nearshore areas, shallow, or deep water reefs. These protections still being in effect will allow individuals to grow and mature, increasing local reproduction of the species.

4. Protect selected species and the habitats on which they depend, while allowing some commercial and/or recreational harvest of migratory, highly mobile, or other species; and other activities.
    a. This MMP objective displays the central ideas of Petition2023-15MPA, clearly stating areas like those requested in the petition be provided. The Channel Islands MPAs (which contain the three MPAs in the petition) are the oldest in the modern network and expand the furthest offshore, yet they provide the least amount of pelagic allowance in the State. The original intentions for these MPAs was protecting local, non-pelagic species, namely groundfish. The Footprint Reserve is a glowing example of this, disconnected from any mainland or island and over a deepwater reef that once was a groundfish fishing area. The MPA went in to specifically rebuild overfished groundfish populations, yet it provides no pelagic allowance. In fact, the Footprint is the <u>only</u> MPA in the State that is disconnected from land that does not have any type of limited pelagic allowance.

Broadly speaking, the Channel Islands network exceeds the State Network in terms of percent area in MPAs, 21% of island waters are protected compared to the State as a whole which has 16% of its waters protected. The Channel Islands are also the only network of MPAs in the State that extend 6 nautical miles offshore, twice the normal 3 nm distance offshore we see. This offshore expansion interferes more with HMS/pelagic fisheries compared to the other State MPAs that are more nearshore.

One would assume that with the higher percent of protection locally and twice the offshore interference that reasonable amounts of pelagic or HMS access would be given, yet the Channel Islands network offers the least pelagic access in the entire MPA network. Where 40% of the State MPAs have some form of pelagic allowance the Channel Islands network only provides 3.5%. While these protections were justifiable over 20 years ago when MPAs were newer, the coastal network didn't exist, the MMPs didn't exist, and less was known about MPAs and pelagic species; the two more-modern MMPs and this objective specifically are glowing examples of why we must adaptively manage the network and provide reasonable amounts of pelagic access where it is realistic as touched on above in Goal 2.2a.

MLPA Goal 3. To improve recreational, educational, and study opportunities provided by marine ecosystems that are subject to minimal human disturbances, and to manage these uses in a manner consistent with protecting biodiversity.

1. Sustain or enhance cultural, recreational, and educational experiences and uses (for example, by improving catch rates, maintaining high scenic value, lowering congestion, increasing size or abundance of species, and protecting submerged sites).
    a. The allowance of this petition would certainly provide decongestion of HMS or pelagic fishing areas, especially around Santa Cruz Island during Naval Activity days when most areas beyond 3nm of the island are closed and pelagic opportunity is extremely limited. Catch rates would increase relatively proportional to the included area as the MPAs do not hold significantly more or less HMS or pelagic finfish than the already open waters do. Scenic value of land based and submerged sites would not change, as HMS or pelagic fishing activity has little to no bottom contact interference and is done offshore away from the more biodiverse nearshore areas. Lastly, as mentioned, the size and abundance of local species will not change as they will still be protected, even the size and

abundance of HMS or pelagics should not vary beyond normal fluctuations due to the species covering so much area.

2. Provide opportunities for scientifically valid studies, including studies on MPA effectiveness and other research that benefits from areas with minimal or restricted human disturbance.
    a. Within the three MPAs the petition looks at there are currently no scientific studies occurring in the midwater where limited take will be present. Occasional bottom surveys of deep water reefs occur inside and outside of these MPAs and the broader Channel Islands; however, a pelagic allowance will not affect these ROV trips or the adundence/diversities of species researchers observe on said trips (we already interact with them when they are outside of the MPAs).

3. Provide opportunities for collaborative scientific monitoring and research projects that evaluate MPAs that promote adaptive management and link with fisheries management, seabird and mammals information needs, classroom science curricula, cooperative fisheries research and volunteer efforts, and identifies participants.
    a. If granted, this petition does open some doors for scientific monitoring of an area previously closed to everything being opened to HMS or pelagic finfish. This information could be used as part of future adaptive management cycles of the network. While ties between MPAs and fishery management still do exist, these ties have decreased in the pelagic arena for smaller MPAs and nearshore MPA networks, which is what we currently have. The key reason for this is in order for an MPA to have impact on HMS it would have to cover significant amounts of offshore ocean over multiple jurisdictions and international waters, not the nearshore waters most of our network covers. Enforcement alone of an area of that size is simply unreasonable which is why HMS fisheries are managed under size, quantity, and quota limits, not MPAs.

MLPA Goal 4. To protect marine natural heritage, including protection of representative and unique marine life habitats in South Coast California waters, for their intrinsic value.

1. Include within MPAs key and unique habitats identified by the SAT for this region.
    a. The SAT identified several key and unique habitats to be included in the Southern California section. All of these habitats concern unique bottom structures or substrates and nearshore features like kelp forests. The primary habitat HMS fishing will occur is away from these habitats in open

water. Any of these unique habitats will still remain protected as HMS or pelagic effort never occurs there enough.

2. Include and replicate, to the extent possible [practicable], representatives of all marine habitats identified in the MLPA or the California Marine Life Protection Act Master Plan for Marine Protected Areas across a range of depths.
    a. This object mirrors the previous Goal 4.1 and requests protections exist across the listed unique habitats in a variety of depth ranges. The three MPAs in Petition2023-15MPA will still have the same protections on the habitat and local, non-pelagic species that live in said habitat.

MLPA Goal 5. To ensure that South Coast California's MPAs have clearly defined objectives, effective management measures, and adequate enforcement, and are based on sound scientific guidelines.

1. Minimize negative socioeconomic impacts and optimize positive socioeconomic impacts for all users including coastal dependent entities, communities, and interests, to the extent possible, and if consistent with the MLPA and its goals and guidelines.
    a. Opening these areas, to the requested levels of HMS or pelagic take the petition requests, would minimize the negative socioeconomic impacts these areas currently have while they are no-take. While total take of HMS will not increase by magnitudes, allowance of HMS take inside of the three MPAs will offer alternatives to fishermen on poor weather days due to the MPAs covering most of the consistently calm waters around the Channel Islands. This will not only help to increase local and cleaner commercial fisheries, but also offer benefits to recreational pelagic fisheries, especially catch-and-release marlin fisheries. All of this could be accomplished whilst still meeting the objectives of the MMP and protecting the species that these MPAs are meant for.

2. Provide opportunities for interested parties to help develop objectives, a long-term monitoring plan that includes standardized biological and socioeconomic monitoring protocols, a long-term education and outreach plan, and a strategy for MPA evaluation.
    a. This objective is somewhat out of the scope of Petition2023-15MPA in this analysis; however, any possible long term monitoring of the MPAs after a change like this is encouraged to validate the claims made in this petition, and that what we see as an effect of making this change is what we expect.

3. Effectively use scientific guidelines in the California Marine Life Protection Act Master Plan for Marine Protected Areas.
    a. I urge the department and commission to follow these guidelines and MMP objectives for this petition process, as their is their entire purpose, and to understand that Petition2023-15MPA does in fact have explicit support from the MMP and by extension the MLPA. This analysis is meant to show that Petition2023-15MPA is adhering to most, if not all, of these scientific guidelines/objectives.

4. Ensure public understanding of, compliance with, and stakeholder support for MPA boundaries and regulations.
    a. While any limited-take area offers more complexity than a completely open or closed area, similar existing MPAs in the State that allow for pelagic take show the public can understand and follow regulations allowing take of a set list of species, pelagic finfish or HMS. Outside of MPAs, groundfish exclusion areas (GEAs), established federally, also mirror this petition by restricting only non-pelagic species take (groundfish take) but still allowing for all pelagic take displaying public understanding and enforcement feasibility.

        It goes without saying that among those that frequent the Channel Islands offshore areas for pelagic species, a petition like this has complete public support. I have been on the water around these islands for 25 years, and was a part of the first generation of anglers to grow up with these MPAs in effect. Throughout these years the call to allow pelagic access in these areas has existed throughout the local community, and without this call, this massive community driven consensus, this petition would have never existed.

        There are some who oppose this petition, there always will be; however, one thing I have yet to receive is a scientifically based reason for these areas to remain closed to HMS or pelagic species, all rational has been emotional. While there are research studies that show massive MPAs, those that rival the size of this State in area, may offer some benefits to pelagics, our Network simply does not and cannot accommodate that type of scale. In fact, a denied petition in 2020 by this Commission explicitly stated that on the record, when a petition requested an MPA be made for an HMS (white sharks) this commission's reply was to deny it because, “MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species.” This precedent has been set

multiple times, there is no reason to not apply it to a set of MPAs that were made before it all, this is a textbook example of adaptive management.

5. Include simple, clear, and focused site-specific objectives/rationales for each MPA and ensure that site-level rationales for each MPA are linked to one or more regional objectives.
    a. The founding reasons for these MPAs at the Channel Islands in 2002 was the idea to protect our local, non-pelagic species, mainly groundfish at the time. These ideas are still reiterated today in the MPA summaries of all three of these MPAs, the focus on non-pelagic local species, birds, and mammals is clear. While the existing protections certainly can continue to accomplish that objective, Petition2023-15MPA offers a way we can both meet those same goals, and allow for some reasonable forms of take for pelagic species as we see elsewhere in the more modern MPA network. The rationales laid out in this document are evidence that under Petition2023-15MPA's changes we can still meet the same regional objectives we currently meet, plus those revolving around reasonable levels of pelagic take. These additional met objectives, and lower economic impacts make this petition one that arguably helps strengthen the overall network, not weaken it.

MLPA Goal 6. To ensure that the South Coast's MPAs are designed and managed, to the extent possible, as a component of a statewide network.

1. Provide opportunities to promote a process that informs adaptive management and includes stakeholder involvement for regional review and evaluation of management effectiveness to determine if regional MPAs are an effective component of a statewide network.
    a. We are currently in this adaptive management process as a result of the DMR which includes stakeholder involvement at Commission and MRC meetings discussing this and other MPA adaptive management petitions. While I wish official meetings could be held regionally for petitions I understand that is not doable for this specific process. That being said, unofficial meetings where locals attended (clubs, organizations, MPA Collaboratives) feedback on this petition was overwhelmingly positive.

2. Provide opportunities to coordinate with future MLPA regional stakeholder groups in other regions to ensure that the statewide MPA network meets the goals of the MLPA.

    a. This is already being done at the full commission and MRC levels where stakeholders across the State voice thoughts on regional MPA petitions. Stakeholder support for a petition like this is what one would generally expect, local fisheries/community support, statewide support from fisheries groups/organizations, and statewide lack of support from environmental organizations. It should again be mentioned that supporting reasons for petition2023-15MPA and how it is supported by both the objective and goals of the MMP and MLPA respectively, is the purpose of this document.

3. Ensure ecological connectivity within and between regional components of the statewide network.
    a. The Channel Islands network is unique in that it is partially isolated brom the Coastal MPA network. That being said, connectivity will still be occurring under an accepted petition in part or full as existing protections on species that actually benefit from these MPAs and their habitats will still remain protected. This will keep local species connectivity as strong as it has been under the current network. Pelagic species will still have local MPAs that are no-take at all four islands, in the border network, and far offshore (but still inside the EEZ) where little or no pressure exists on them.

4. Provide for protection and connectivity of habitat for those species that utilize different habitats over their lifetime.
    a. As mentioned in several of the above objectives, those species that utilize different habitats over their lifetime are primarily local, non-pelagic species. These species will remain completely protected. Pelagic and especially HMS are species that are in the open water, pelagic region their entire lives, from egg to maturity. All of the species proposed for limited take in Petition2023-15MPA have very limited, if any, interactions or movements between different habitats explicitly due to their life cycles.

The above analysis of the MPA Master Plan's objective based analysis process for adaptive management changes to the MPA network clearly shows that Petition2023-15MPA is supported by the MMP and the MLPA. Not only are there guiding objectives of the 2016 and 2008 MMPs that outright say we must provide areas for pelagic take and that pelagic species are less affected by MPAs, but here we have the Channel Islands network of MPAs that came into effect prior to any MMP providing almost no limited pelagic areas, nothing comparable to what we see in the more-modern coastal network that was guided by the MMP. This is a glowing example of the need for adaptive management in lieu of guiding management documents, CDFW

and FGC statements on previous petitions, and actual MPA implementations from the coastal MLPA that are based on our more-modern data and scientifically based evidence and outlook on MPAs. If I could only say one thing about this petition it would be: we can have pelagic allowed areas and our local protections without weakening the network just like we already have everywhere else. Please consider granting this petition.

Thank you,
Blake Hermann
Petitioner - Petition2023-15MPA

From: Blake Hermann <[redacted]>
Sent: Friday, May 2, 2025 10:28 AM
To: FGC <FGC@fgc.ca.gov>; Ashcraft, Susan@FGC <[redacted]>; Shuman, Craig@Wildlife <[redacted]>
Cc: Newell, Caroline-Contractor@FGC <[redacted]>; Gonzales, Kara@Wildlife <[redacted]>
Subject: Petition2023-15MPA-AM2 MLPA LOP Breakdown and option preference refinement

Hello all,

This comment is intended primarily for the **July MRC** meeting, but can be tagged in June/August's FGC as well, similar to the MMP analysis. This is an early submission.

See attached analysis document applying the MLPA LOP framework on Petition 15, LOPs were confirmed by the Department. The goal here being to display all options for consideration. Showing those options that maintain MPA network connectivity under this framework (not reducing network protections), those that do reduce connectivity (reducing network protections), and, most importantly, why on an LOP and sizing basis. Working through this framework allowed myself to and will allow stakeholders to view all options and their LOP rankings in their entirety and understand why they are ranked that way under the LOP framework. The conclusion of this framework application being that there are preferred pathways for Petition 15 that grant limited access to pelagic/HMS fisheries while maintaining the existing levels of MPA connectivity the network has today, not reducing overall network protections.

Thank you,

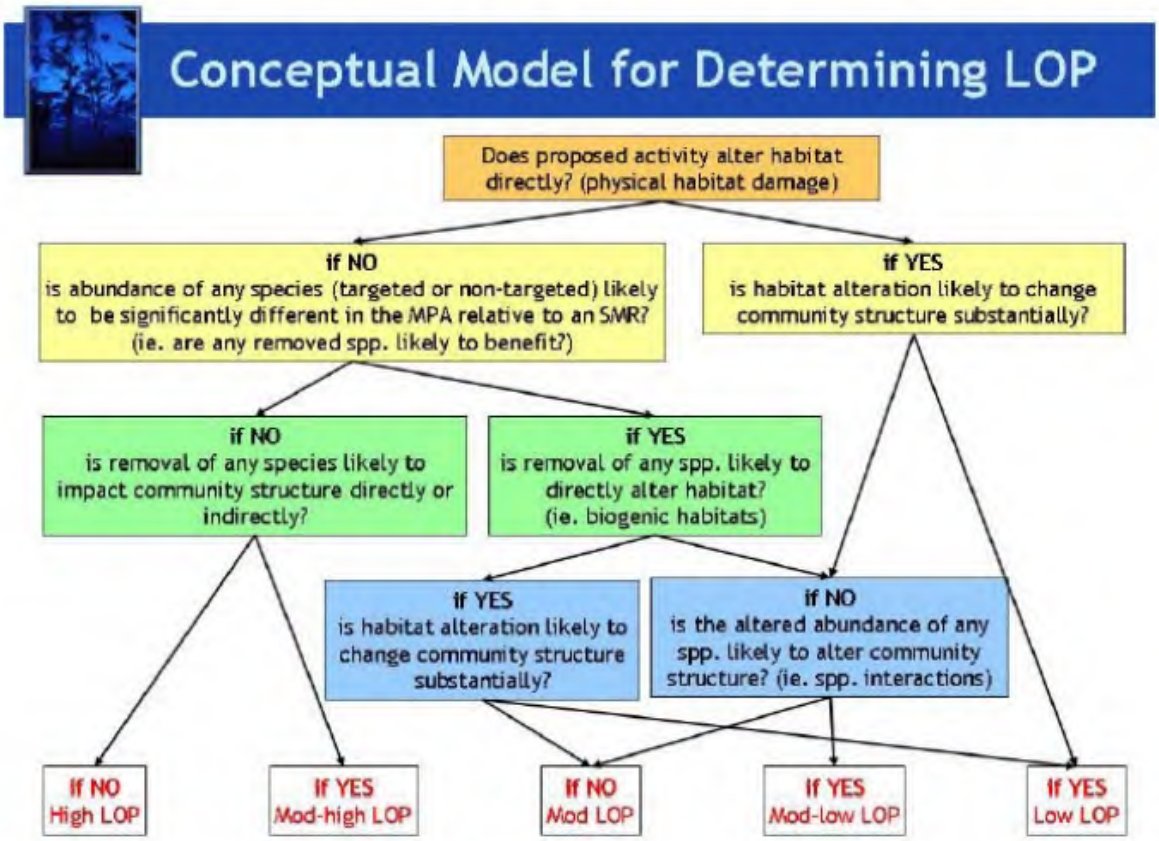
Blake Hermann
Petitioner: Petition2023-15MPA-AM2

Petition2023-15MPA's Levels of Protection (LOP) analysis

Dear Fish and Game Commission Commissioners, MRC, Department and Commission Staff,

Continuing down the adaptive management process of the MPA network, this comment letter serves to look at Petition2023-15MPA-AM2 through the lens of the MLPA's original levels of protection (LOP) and MPA sizing analysis documentation. This letter can be considered similarly to a previous letter submitted looking at the same petition through the lens of the MLPA MPA Master Plan (MMP) submitted at the March 2025 MRC Meeting. It can be seen as a petition analysis document that helps guide final recommendations through an attempt to objectively apply said framework, the LOP framework, on the petition to better refine final outcomes and preferred final options. CDFW's own analysis, though SeaSketch, somewhat mirrors this document, and its application of this framework. This letter serves as a way to shed a more detailed light on the specifics of the protection, sizing, and connectivity requirements for the MPA network under this petition. All framework analysis assignments to the MPAs in Petition2023-15MPA-AM2 in this document were verified by CDFW and should also be viewable on SeaSketch by the time this analysis is published publicly.

Attached below is the conceptual model for determining an LOP in the southern bioregion and the fishing activity chart assigning general LOPs to specific gear types and depth ranges for the southern region. These are the guiding framework pathways for the MLPA in this regard.

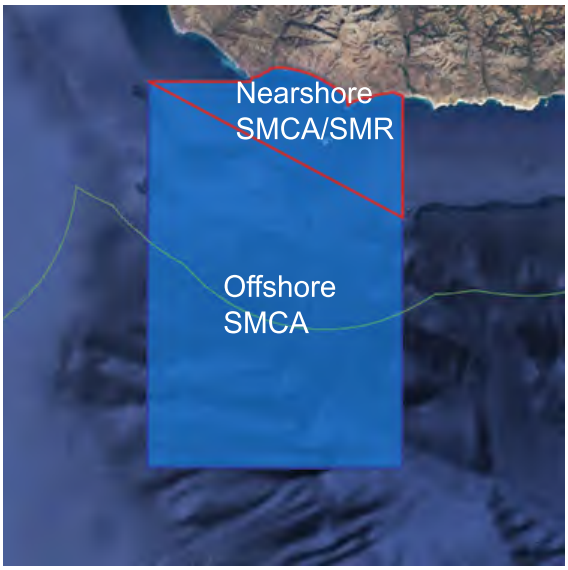
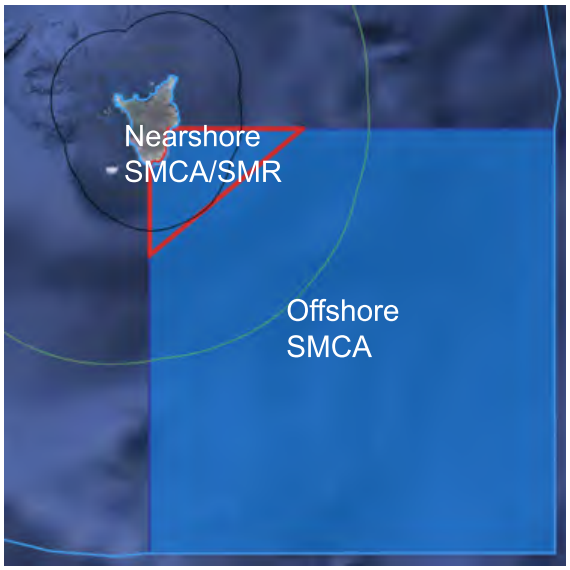


Level of Protection	MPA Types	Activities associated with this protection level
Very high	SMR	**No take**
High	SMCA	**Coastal pelagic finfish and bonito** (pelagic seine, dip net); **pelagic finfish, bonito and white seabass** (spearfishing); **market squid** (pelagic seine, dip net); **jumbo squid** (H&L-squid jigs); **swordfish** (harpoon); **In water depth > 50m: pelagic finfish, bonito and white seabass** (H&L);
Mod-high	SMCA	**Pier fishing** (H&L, hoop-net)**; halibut** (spearfishing); **catch and release** (H&L-surface gear, single barbless hooks, and artificial lures) **In water depth <10m: Catch and release** (H&L-single barbless hooks and artificial lures) **In water depth 30<50m on mainland: pelagic finfish, bonito and white seabass** (H&L, surface gear only)**;**
Moderate	SMCA SMP	**spot prawn** (trap)**; sea cucumber** (diving)**; grunion** (hand harvest); **giant kelp** (hand harvest); **clams** (hand harvest);
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);
Low	SMCA SMP	**Rock scallop** (diving); **mussels** (hand harvest); **giant kelp** (mechanical harvest)**; marine algae other than giant and bull kelp** (hand harvest);

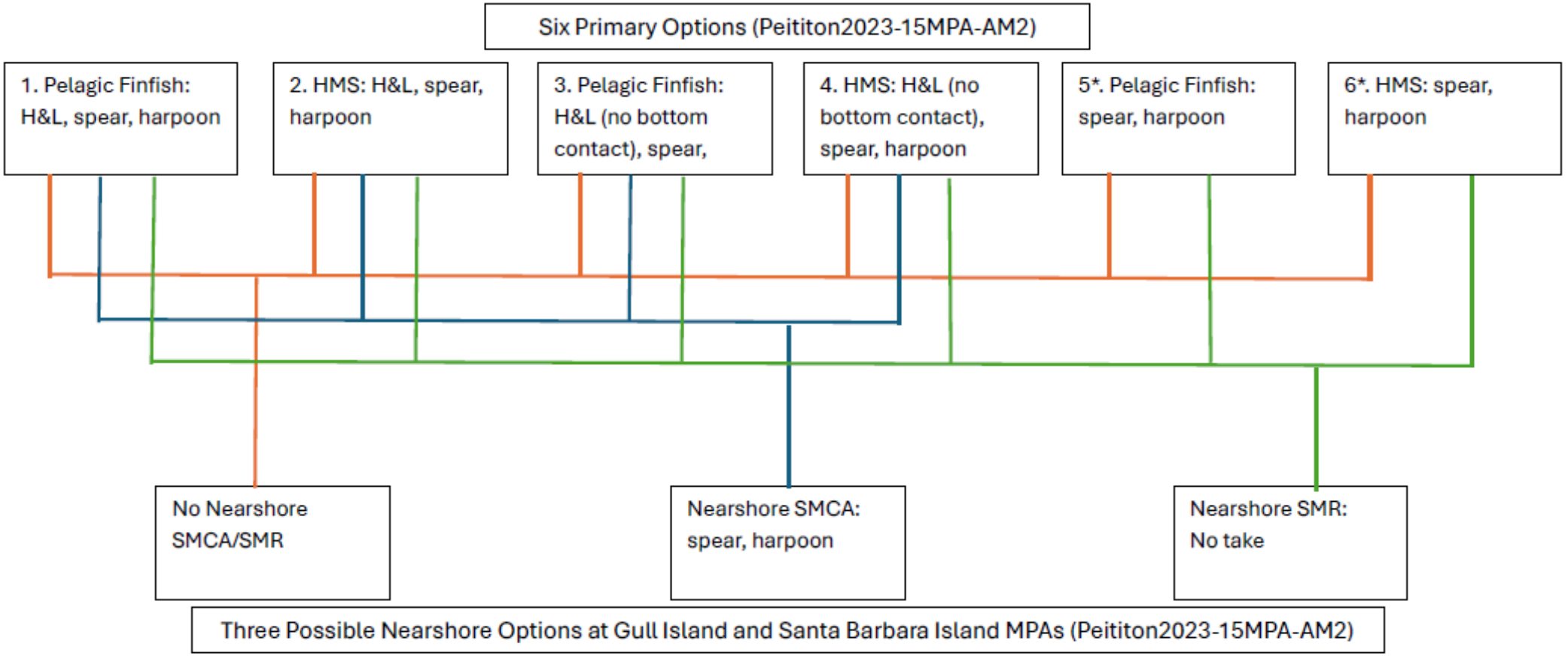
Images 1 and 2: Conceptual LOP model from the MLPA process and specific activities assigned LOPs for the Southern Bioregion specifically.

Peititon2023-15MPA-AM2 contains 3 primary gear allowance options for 2 subsets of pelagic species, pelagic finfish and HMS. This leads to the current six proposed main options on the table. In addition to the six “gear options,” there exists options to create nearshore/offshore MPAs at two of the three MPAs in the petition, Gull Island, and Santa Barbara Island (SBI). These nearshore MPAs would have stricter take regulations or have no-take at all in the nearshore areas where more non-pelagic bycatch exists and could be affected (nearshore coordinates and images on next page).

For any options creating a new nearshore/offshore MPA “cluster,” MLPA definitions state MPA clusters have their total size, nearshore area plus offshore area, counted toward the minimum sizing requirement of 9 square miles for the southern region. If sizing is met, both nearshore and offshore areas must have an LOP of at least moderate high (mod-high) in their respective areas to count toward connectivity (per SeaSketch and Staff). At Gull Island the nearshore MPA would be 5.9 square miles and offshore 14 for a total of 19.9 square miles. At Santa Barbara Island the nearshore MPA would be 3 square miles and offshore 9.8 for a total of 12.8 square miles. Both clusters exceed the minimum 9 square miles requirement; therefore, if both nearshore and offshore areas of each cluster at Gull Island and SBI meet at least a mod-high LOP, the existing MPA connectivity these areas have today will still be in effect after changes are made, not reducing network connectivity or protections like some argue.

Current proposed Coordinates and options for the Nearshore limited take (SMCA) or no take (SMR) areas at the Gull Island and Santa Barbara Island MPAs	
Gull Island Nearshore MPA	Santa Barbara Island Nearshore MPA
The nearshore-offshore border would be bound by a straight line running from 33° 58.000' N. lat. 119° 53.000' W. long, to 33° 55.800' N. lat. 119° 48.000' W. long. within the existing MPA. Regulation options within nearshore area: Take of pelagic finfish or HMS (option dependent) via recreational spearfishing and commercial harpoon swordfish. Or A no-take region	The nearshore-offshore border would be bound by a straight line running from 33° 28.500' N. -118° 59.300' W. to 33° 26.500' N. -119° 02.200' W within the existing MPA. Regulation options within nearshore area: Take of pelagic finfish or HMS (option dependent) via recreational spearfishing and commercial harpoon swordfish. Or A no-take region
	

In total, this means there are up to sixteen possible outcomes, per MPA, at the two MPAs containing possible nearshore/offshore configurations, Gull Island and SBI (see Chart 1 below). For the Footprint MPA, there are only the six main options because there are no proposed nearshore configurations due to the MPA being entirely offshore and covering only waters >50m (the published MPA data sheet states the shallowest zone is 171ft (52m)).



Hook-and-line (H&L) take under all options currently include recreational and commercial H&L take.
Options 3 and 4 also allow possession only of coastal pelagic species (CPS) which would be for baitfish for H&L use.
Spear and harpoon gears are recreational and commercial only, respectively.
*: Options 5 and 6 do not include the nearshore SMCA option as they would have the same take regulations and therefore be redundant leaving 16 total possible configurations.

The goal of Petition2023-15MPA-AM2 is to allow for reasonable levels of HMS or pelagic take that does not affect MPA connectivity and is supported by the MLPA MPA Master Plan (MMP). The MMP analysis of the petition submitted in March 2025 showed that this petition's changes are still supported by the MMP/MLPA. This breakdown now takes a look at the LOP tiers and sizing requirements supplied by the MLPA SAT that determine MPA connectivity. As mentioned, the MLPA states that any reduction below moderate-high (mod-high) LOP loses connectivity. This is not ideal for an outcome of this petition, even though we have SMCAs today that are below that LOP.

At a glance, applying the conceptual LOP model for all of the petition options one can see that we are likely dealing with the high or mod-high LOPs as proposed methods are not altering any habitat, and the abundance of pelagic or HMS are not going to be any different inside the MPA versus the surrounding area. Generally, community structure is not significantly affected by a pelagic finfish allowance, even more so with an HMS allowance, but for now let's assume either could be the case. Using this rationale on the conceptual model we can immediately see that at the worst case we are in a mod-high LOP, a good start.

That being said, as this petition deals with Channel Islands MPAs, LOPs become more strict with the islands, so we need to look at the specific activity chart to understand the lowest LOPs for each option in order to find the best possible final outcome that balances LOP and reasonable take allowances. Broadly speaking, this petition places three gear types on the table in its six options: hook-and-line, spear, and harpoon swordfish. Applying these three gear types to the activity chart we can see that LOPs for spear of pelagic finfish or HMS, and harpoon of swordfish are all high LOPs. The main conflict comes with a hook-and-line allowance at the islands where hook-and-line of pelagic or HMS is either a high LOP if waters are deeper than 50 meters, or a mod-low LOP if they are shallower than 50 meters, this is a major swing in LOP and would lose connectivity in two of the three MPAs in the petition if mod-low is assigned, Gull Island and SBI. The Footprint will have a high LOP no matter what option is selected as it is entirely deeper than 50m. While it was and still is the intent of this petition that any possible limited take allowance for pelagic finfish or HMS is done offshore and deeper than 50m, the "worst case" must be applied when determining an LOP for the two MPAs that are shallower than 50m. However, the petition does provide a "fix" to maintain a high LOP at minimum at Gull Island and SBI, nearshore SMCAs or SMRs. The following chart breaks down these options at each MPA, assigns it the worst case LOP, and gives a brief explanation as to the LOP ranking. Note that Gull island and SBI MPAs are bundled together as their respective LOP rankings and explanations are the same and have the same rationale.

Note: For users that have viewed the petition on SeaSketch, the nearshore SMCA option is displayed at Gull Island and SBI as it has "less protection" than a nearshore SMR. While either a nearshore SMCA or SMR maintain connectivity, the SMCA was selected as it would be the "largest change" to the area and was technically the preferred option in the petition. The nearshore SMR option is certainly still available, but as only one option could be displayed on SeaSketch the SMCA was selected by CDFW for that reason.

Petition2023-15MPA-AM2 The Footprint MPA: Option LOPs		
Option and Take Allowances	Nearshore Option	LOP and Explanation
Option 1: Take of pelagic finfish is allowed via H&L, recreational spear, and commercial harpoon swordfish.	The Footprint MPA contains no nearshore options as it is entirely offshore and deeper than 50m.	**High:** Regardless of the decided on option, in the case of the LOP activity chart and framework, a high LOP is assigned to the entire footprint MPA. The three gear methods provided in all options, H&L, spear, and harpoon swordfish would all be done in waters deeper than 50m for either pelagic finfish or HMS. All methods have a high LOP rank in this case and in this depth range.
Option 2: Take of HMS is allowed via H&L, recreational spear, and commercial harpoon swordfish. CPS possession (for baitfish)		
Option 3: Take of pelagic finfish is allowed via H&L, recreational spear, and commercial harpoon swordfish. Use of bottom-contact gear is restricted.		
Option 4: Take of HMS is allowed via H&L, recreational spear, and commercial harpoon swordfish. Use of bottom-contact gear is restricted. CPS possession (for baitfish)		
Option 5: Take of pelagic finfish is allowed by spear, and harpoon swordfish.		
Option 6: Take of HMS is allowed by spear, and harpoon swordfish.		

Petition2023-15MPA-AM2 Gull Island and Santa Barbara Island MPAs: Option LOPs		
Option and Take Allowances	Nearshore Option	LOP and Explanation
Option 1: Take of pelagic finfish is allowed via H&L, recreational spear, and commercial harpoon swordfish.	No Nearshore MPA	**Mod-low:** Allowance of H&L take of pelagic finfish in the whole MPA technically allows for possible H&L take in waters shallower than 50m. Even if the possibility is low the chance exists and a mod-low LOP is assigned.
	Nearshore SMCA: Pelagic finfish take by spear, and harpoon swordfish Offshore SMCA: Option 1 allowances	**High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m. The nearshore allowable methods of spear and harpoon are high LOPs nearshore and offshore, and the H&L allowance is now a high LOP as its pelagic finfish allowance is exclusively in waters deeper than 50m.
	Nearshore SMR: No take Offshore SMCA: Option 1 allowances	**Very High/High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m and would be entirely closed to fishing (no-take), a very high LOP. The allowed H&L, spear, and harpoon gears in the offshore SMCAs are all in waters deeper than 50m, a high LOP.
Option 2: Take of HMS is allowed via H&L, recreational spear, and commercial harpoon swordfish. CPS possession (for baitfish)	No Nearshore MPA	**Mod-low:** Allowed H&L take of HMS in the whole MPA technically allows for possible H&L take in waters shallower than 50m. Even if the possibility is even lower than pelagic finfish chances the chance exists so a mod-low LOP is assigned.

	Nearshore SMCA: HMS take by spear, and harpoon swordfish Offshore SMCA: Option 2 allowances	**High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m. The nearshore allowable methods of spear and harpoon are high LOPs nearshore and offshore, and the H&L allowance is now a high LOP as its HMS allowance is exclusively in waters deeper than 50m
	Nearshore SMR: No take Offshore SMCA: Option 2 allowances	**Very High/High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m and would be entirely closed to fishing (no-take), a very high LOP. The allowed H&L, spear, and harpoon gears in the offshore SMCA are all in waters deeper than 50m, a high LOP.
Option 3: Take of pelagic finfish is allowed via H&L, recreational spear, and commercial harpoon swordfish. Use of bottom-contact gear is restricted.	No Nearshore MPA	**Mod-low:** Allowed H&L take of pelagic finfish in the whole MPA technically allows for possible H&L take in waters shallower than 50m. It is not stated in the LOP chart that a no-bottom-contact H&L allowance prevents a mod-low LOP but compared to options without the no-bottom-contact clause this offers some level of higher protections.
	Nearshore SMCA: Pelagic finfish take by spear, and harpoon swordfish Offshore SMCA: Option 3 allowances	**High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m. The nearshore allowable methods of spear

		and harpoon are high LOPs nearshore and offshore, and the H&L allowance is now a high LOP as its pelagic finfish allowance is exclusively in waters deeper than 50m.
	Nearshore SMR: No take Offshore SMCA: Option 3 allowances	**Very High/High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m and would be entirely closed to fishing (no-take), a very high LOP. The allowed H&L, spear, and harpoon gears in the offshore SMCAs are all in waters deeper than 50m and are non-bottom-contact, a high LOP.
Option 4: Take of HMS is allowed via H&L, recreational spear, and commercial harpoon swordfish. Use of bottom-contact gear is restricted. CPS possession (for baitfish).	No Nearshore MPA	**Mod-low:** Allowed H&L take of HMS in the whole MPA technically allows for possible H&L take in waters shallower than 50m. It is not stated in the LOP chart that a no-bottom-contact H&L allowance prevents a mod-low LOP but compared to options without the no-bottom-contact clause this offers some level of more protections and is even more restrictive to HMS only.
	Nearshore SMCA: HMS take by spear, and harpoon swordfish Offshore SMCA: Option 4 allowances	**High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m. The nearshore allowable methods of spear and harpoon are high LOPs nearshore and offshore, and the H&L allowance is now a high LOP as its HMS allowance is exclusively in waters deeper than 50m.

	Nearshore SMR: No take Offshore SMCA: Option 4 allowances	**Very High/High:** The proposed nearshore MPAs at Gull Island and SBI contain all waters shallower than 50m and would be entirely closed to fishing (no-take), a very high LOP. The allowed H&L, spear, and harpoon gears in the offshore SMCAs are all in waters deeper than 50m, are non-bottom-contact, and only allow for HMS take, a high LOP.
Option 5: Take of pelagic finfish is allowed by spear, and harpoon swordfish.	No Nearshore MPA	**High:** As this option removes the H&L allowances and only allows pelagic finfish spearfishing or harpoon swordfish take, the entire MPA across its full depth ranges gets a high LOP.
	Nearshore SMCA: Pelagic finfish take by spear, and harpoon swordfish Offshore SMCA: Option 5 allowances	**<u>Redundant:</u>** Not needed as nearshore SMCA would have the same regulations as offshore. (Still high LOP)
	Nearshore SMR: No take Offshore SMCA: Option 5 allowances	**Very High/High:** Same spear and harpoon allowable methods but restricted to offshore SMCA only for pelagic finfish. Nearshore would be no-take, a very high LOP, while offshore would have the spear and harpoon allowances, a high LOP.

Option 6: Take of HMS is allowed by spear, and harpoon swordfish.	No Nearshore MPA	**High:** As this option removes the H&L allowances and only allows HMS spearfishing or harpoon swordfish take, the entire MPA across its full depth ranges gets a high LOP.
	Nearshore SMCA: HMS take by spear, and harpoon swordfish Offshore SMCA: Option 6 allowances	**<u>Redundant:</u>** Not needed as nearshore SMCA would have the same regulations as offshore. (Still high LOP)
	Nearshore SMR: No take Offshore SMCA: Option 6 allowances	**Very High/High:** Same spear and harpoon allowable methods but restricted to offshore SMCA only for HMS. Nearshore would be no-take, a very high LOP, while offshore would have the spear and harpoon allowances, a high LOP.

Working through this framework we gain an unbiased analysis of the proposed option combinations to see which are most viable. Balancing the assigned LOPs of each option and the support of the MLPA and its MPA Master Plan, with fisheries access is and should be a key goal here. Using this framework we can see there are several viable options meeting a high LOP and in some cases a high/very high LOP in all three existing MPAs preserving any connectivity they already have if they meet MPA sizing requirements, which Gull Island and SBI do. We can also see that there are options that result in a moderate-low LOP, losing connectivity regardless of size. These mod-low options are exclusive to options regarding the two MPAs attached to the islands, Gull Island and SBI and allowing hook-and-line take of HMS or pelagic finfish nearshore (<50m). All of these problems can be resolved by deploying the nearshore SMCA or SMR options which both restrict hook-and-line take <50m making the nearshore and offshore MPAs a “cluster” with high LOPs at least, or high/very high if the nearshore SMR and offshore SMCA is used, maintaining network connectivity.

<u>Analysis Outcomes:</u>

As a result of this analysis, while all of the above options are still in Peititon2023-15MPA-AM2, to preserve biological connectivity between the MPA network it is best to consider only those options with high or high/very high LOPs for final action. This means, for The Footprint MPA, all options are still available, six in total, with the same preference structure in the petition. This is because no matter the option selection The Footprint MPA will have a high LOP.

For the Gull Island MPA and Santa Barbara Island MPA, it is requested to less-consider all option configurations that result in a below moderate-high LOP, and to select either a nearshore SMCA or SMR to better protect nearshore species and to maintain a high LOP in each MPA cluster under the preferred options that allow H&L access for pelagic finfish or HMS. This can be done by leaving the 6 primary options in, applying them to the offshore SMCA only, and having either a nearshore SMCA or SMR go in with no H&L allowance. It was preferred in the petition that this be a nearshore SMCA, but a nearshore SMR is certainly still an available choice due to an SMR offering possibly better nearshore enforcement. Any of the six main options can still be applied in the offshore SMCA and have a high LOP, resulting in MPA clusters at Gull Island and SBI that are of sufficient size and LOP to maintain the connectivity they already have, exceeding the minimum LOP requirement by one whole tier. The preference structure for the offshore SMCAs is the same order as stated in the current petition.

In closing, I would like to thank all staff members that were able to supply the original MLPA LOP and sizing documents for this analysis, and the SeaSketch team/CDFW for developing such an intuitive application for the public to look at these petitions. Hopefully, this individual analysis allows all to better grasp Petition2023-15MPA-AM2's requests, and better understand how these options do have paths to retain, not reduce, our MPA networks's existing protections while allowing reasonable levels of access as well.

Thank you,
Blake Hermann
Petitioner - Petition2023-15MPA-AM2

July 31, 2025

Erika Zavaleta
California Natural Resources Headquarters Building
715 P Street, 2nd Floor
Sacramento, CA 95814

Re: **Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA**

Dear President Zavaleta and Honorable Commissioners:

We would like to begin by thanking the Marine Resource Committee, the full Fish and Game Commission (FGC) and California Department of Fish and Wildlife (CDFW) for their dedication to the adaptive management process of California's MPA network. As the FGC and CDFW continue reviewing the Marine Protected Area (MPA) petitions, we ask that you consider the below arguments against specific petitions looking to weaken the MPA network. Specifically, the requests of petition 2023-14 MPA to open nine MPAs along the coast to commercial urchin fishing and petition 2023-15 MPA to allow some form of take of highly

migratory species, coastal pelagic species, and/or pelagic finfish at three MPAs at the Channel Islands.

I. The FGC and CDFW Should Reject PETITION 2023-14MPA- Opening Sea Urchin Harvest to Commercial Fishermen Within Existing Marine Protected Areas.

The decline of kelp forest ecosystem is due to many factors, including a significant increase in purple urchins, which leads to urchin barrens where vibrant kelp forests once existed. Petition 2023-14 MPA requests that nine existing MPAs from the North to the South Coast be opened for commercial urchin fishing for economic reasons. We request that the FGC and CDFW reject this petition to open multiple State Marine Conservation Areas (SMCAs) (Double Cone Rock SMCA, Sea Lion Cove SMCA, Stewart's Point SMCA, Salt Point SMCA, Naples SMCA, Anacapa Island SMCA, Point Dume SMCA, Point Vicente SMCA (no-take), Swami's SMCA) to allow commercial take of sea urchins to aid in kelp forest restoration. First, any benefits of this petition are outweighed by the considerable costs to the MPA goals and environment of allowing commercial urchin fishing in MPAs. Second, the lack of clarity by the petitioner as to which species of urchin would be commercially fished is concerning. Third, using SeaSketch to determine habitat connectivity under the petitioners' request would see the loss in connectivity in multiple habitats.

A. Benefits and Cost Synthesis

The benefits and costs of harvesting sea urchins within MPAs in California are complex, involving ecological, economic, and management trade-offs. Here is a synthesis of key points.

1) **Scientific Disagreement and Uncertainty**: The trophic dynamics of predator-prey relationships for urchins within California are poorly understood and vary region to region. In Northern California, where purple urchin overpopulation has devastated kelp forests (creating "urchin barrens"), targeted harvesting has been used to aid kelp recovery. Projects like the Giant Kelp Restoration Project involved culling urchins, which allowed kelp to regrow in some areas. However, this project was highly restricted and regulated to minimize damage to the ecosystem while targeting the purple urchin using trained divers. The challenges and importance of regulating harvest within MPAs have been researched in the Mediterranean, with similar findings for the need to restrict and oversee any management interventions such as this.[1]
2) **Ecological Disruption**: MPAs are designed to protect trophic cascades, where predators (e.g., lobsters, sheephead, sea otters) control urchin populations, indirectly safeguarding kelp forests. Harvesting urchins—or their predators—can disrupt this balance, leading to kelp loss and habitat degradation. Currently, within California there is scientific uncertainty about the conditions under which urchin harvest will benefit or harm the marine ecosystem.[2]

[1] https://peerj.com/articles/12971/
[2] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/; https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2022.987242/full

3) **Undermines MPA Goals:** Studies in Sardinia found that allowing urchin harvest in MPAs led to population declines, especially where natural predation was already high. Restricted harvest sites, which were highly managed and restricted, had the lowest urchin densities, suggesting cumulative pressures harm recovery.[3] Prohibiting any type of harvest – including sea urchins- has been effective in California.[4]
4) **Short term economic gains over long term ecosystem protection:** The rationale for the petition is rooted in the desire of commercial fishermen- primarily in Southern California- who want to harvest sea urchins arguing that MPAs cause economic hardship. MPAs were established to prioritize biodiversity over short-term fisheries gains, as kelp forests support hundreds of species and mitigate climate impacts.[5] The long-term benefits from protection far exceed short term loss for a handful of fishermen, MPAs are not just conservation tools—they are **investments in sustainable fisheries.**

B. The Petition is Not Supported and Does Not Specify Which Species of Urchin is Included

As the petition reads, the take allowance is for ALL allowed sea urchin species and does not make the distinction of which species would be targeted to benefit kelp forests. According to CDFW, three sea urchin species have been the main species landed across the state. The red, purple, and white sea urchin are the primary species historically caught in California waters, with red urchins being the dominant species caught and sold (Table 1). From January 31, 1980, to December 31, 2024, the total purple urchin landings out of all sea urchin landings (Table 1) accounted for less than one percent of the total catch. The petitioner does not indicate if the allowance for commercial take of sea urchins would be for a specific species or all.

Species Name	Pounds	Value
Sea urchin, red	774,479,211	$429,008,941
Sea urchin, purple	2,043,647	$2,928,395
Sea urchin, white	53,647	$207,324
Total	776,576,511	$432,144,719

Table 1. Sea Urchins landed from January 31, 1980, to December 31, 2024.

It is our understanding that much of the commercial urchin fishery is focused on red urchins (Table 1), but it is the abundance of purple urchins that has contributed to the kelp decline[6] cited in the petition. Paired with the lack of a commercial market for purple urchin, sea urchins collected from barren areas are unlikely to meet the quality standards to be commercially viable. The petitioner's argument for opening the forementioned MPAs to be sustainable

[3] https://pmc.ncbi.nlm.nih.gov/articles/PMC8908888/
[4] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/
[5] https://caseagrant.ucsd.edu/news/examining-climate-wins-marine-protected-areas
[6] Smith, J. G., et al. (2021). Behavioral responses across a mosaic of ecosystem states restructure a sea otter–urchin trophic cascade. *Proceedings of the National Academy of Sciences*, *118*(11), e2012493118.

additions to the commercial fishery is not supported. Additionally, the petitioners did not provide any supporting data for the claim that these nine MPAs have had a significant negative impact on the urchin fishery, nor data on urchin abundance within these MPAs that could be used to do a cost-benefit analysis.

Urchin culling is one method that has had small trials along the California coast to determine effectiveness of direct removal on improving kelp forest density. It was named as a potential tool in the 2022 report "Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach."[7] However, the report also found that scaling up this process would face challenges. Specifically, the costs to go to the sites and remove the urchins would be, "most effective in areas where there is already an established commercial red urchin fishing fleet"[8] Additionally, the report indicates that reducing and **maintaining** low urchin levels is imperative to maintain kelp ecosystem recovery. The long-term socio-economic effectiveness of urchin culling is low, as the costs to start and continue removal efforts increase the further the site is from shore and/or a red urchin port, as well as the lack of viable commercial purple urchin that live inside urchin barrens. It is difficult to say whether opening identified MPAs in this petition would benefit the commercial purple or red urchin fishery.

C. Habitat Connectivity

We utilized the data layers on the recently released tool via SeaSketch to see which habitats will lose connectivity based on the petitioners desired changes to the MPA Network. Of the listed MPAs, Point Dune SMCA, Swamis SMCA, and Point Vicente SMCA would no longer have adequate protections to maintain habitat connectivity for beach, rock, kelp, and soft substrate (0-30m) habitat. The other six MPAs do not have a high enough level of protection to count towards the habitat spacing report.

Accordingly, the petition should be rejected.

II. The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.

This petition requests opening existing no take reserves—the cornerstone of the MPA Network—to commercial fishing for pelagic species, which encompasses a wide range of species,[9] such as sharks, bill fish, tuna, and mahi mahi in Southern California. The Channel Islands State Marine Reserves (SMRs), and Federal Marine Reserves (FMRs) are among the biggest, oldest and most effective MPAs in the country. Petition 2023-15MPA does not support the goals identified during the planning process for the Channel Islands MPAs, and we therefore request that the FGC and CDFW reject the petition to reclassify three SMRs (Footprint SMR,

[7] https://www.reefcheck.org/wp-content/uploads/2022/06/Restoration-of-Northern-Californa-bull-kelp-RCF-final-report-to-OPC.pdf
[8] Ward, M., et al. Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach. Reef Check Foundation, Marina del Rey, CA, April 2022.
[9] https://www.ecfr.gov/current/title-50/chapter-VI/part-660/subpart-K

Gull Island SMR, Santa Barbara Island SMR) in the Northern Channel Islands (NCIs) as SMCAs.

Established in 2003 after the Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC), the Marine Reserves Working Group (MRWG) came up with goals for MPAs at the Channel Islands. The MRWG's goals stated the following:

> (1) Ecosystem Biodiversity Goal: To protect representative and unique marine habitats, ecological processes, and populations of interest; (2) Socio-Economic Goal: To maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties; (3) Sustainable Fisheries Goal: To achieve sustainable fisheries by integrating marine reserves into fisheries management; (4) Natural and Cultural Heritage Goal: To maintain areas for visitor, spiritual, and recreational opportunities which include cultural and ecological features and their associated values; and (5) Education Goal: To foster stewardship of the marine environment by providing educational opportunities to increase awareness and encourage responsible use of resources.[10]

We utilized the goals and reasonings from the "Final 2002 Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary" as the Channel Islands state and federal MPAs pre-date the Marine Life Protection Act and subsequent establishment of the statewide MPA network. Approval of this petition would be inconsistent with these goals for the following reasons.

A. MRWG Goal - **Ecosystem Biodiversity**

The establishment of the Channel Islands MPAs was, "To protect representative and unique marine habitats, ecological processes, and populations of interest," which has translated to the goals and intent of the statewide MPA Network. Past petitions requesting to establish MPAs to protect a singular species have been denied by the FGC. For example, in 2020-2021 the FGC denied a petition requesting for the creation of an MPA for White Sharks near Carpentaria reasoning, "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species."[11] The intent of California MPAs remains to protect all aspects of an ecosystem (ecosystem-wide protection), not one species. Consequently, opening an MPA for one species should also be rejected.

The petitioner makes the argument that opening Footprint SMR, Gull Island SMR, Santa Barbara Island SMR to fishing pressure would have no significant impact on non-migratory species within the MPAs. However, the increase in boat traffic through the previously closed areas would introduce noise pollution, potential derelict fishing gear, water pollution, etc. The

[10] 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).
[11] California Department of Fish and Wildlife (2022). Decadal Management Review: Appendix G Supplemental Tables.

added complexities in the individual MPAs regulations will also increase the hardship on enforcement. Additionally, the same reasons cited to open these MPAs to highly migratory species are also the reasons why we believe it is unnecessary to do so.

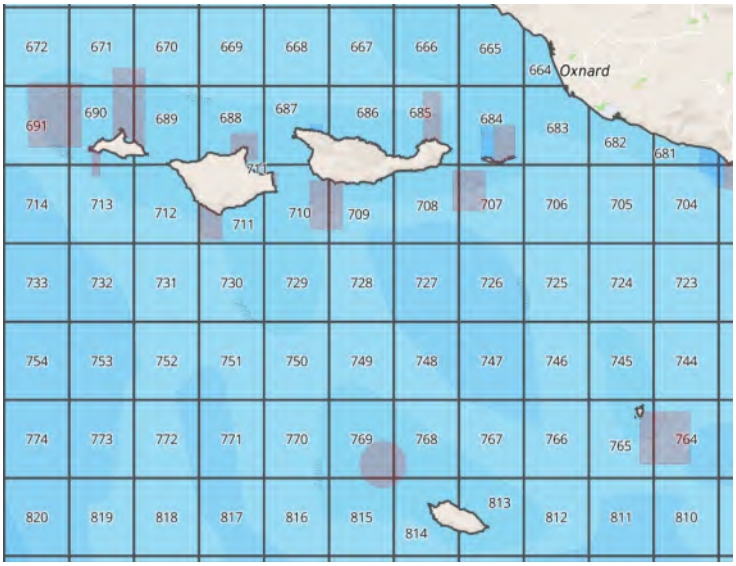


Figure 1. Seasketch Map using layers "Commercial Fishing Blocks" and "Existing Marine Protected Areas (MPAs)"

1. Reasons Why MPAs Protect Highly Migratory Species

Protecting highly migratory species (HMS) like tunas, sharks, and billfish in California waters plays a critical role in maintaining healthy marine ecosystems through trophic cascades, nutrient cycling, and habitat connectivity.

Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition.[12] A sharp decline of large pelagic fish (species such as sharks, swordfishes, marlins, and tuna) that roam the open sea and play vital roles as predators leads to impacts on local, regional and large-scale ecosystem dynamics. Fishing undermines MPA effectiveness which leads to target species depletion, leading to their inability to recover even within MPAs. The risk of bycatch on unintended species is high and unaccounted for, leading to ineffectiveness of the local MPA for all other components of the ecosystem.

2. Maintaining Trophic Balance (Top-Down Control)

- **Predator-prey dynamics:** HMS like bluefin tuna, mako sharks, and swordfish are apex predators that regulate mid-level species (e.g., squid, small fish). Their decline can trigger population explosions of prey species, disrupting food webs. For example, overfishing

[12] https://www.sciencedirect.com/science/article/abs/pii/S0308597X18301866?via%3Dihub.

sharks in Southern California has been linked to increased cephalopod (squid/octopus) populations, which then overconsume shellfish and crustaceans.[13,14]

- **Nutrient Cycling:** Migratory species transport nutrients across vast distances. When they feed in deep waters and excrete near the surface, they fertilize phytoplankton (the base of the marine food web), delivering valuable nutrients to MPAs. In addition, highly migratory species such as tunas and billfish contribute to the "biological carbon pump" by moving nutrients vertically, as part of benthic pelagic linkages, which enhances ocean productivity.
- **Protecting Spawning & Nursery Grounds:** Many HMS rely on offshore areas such as the MPAs for spawning and recruitment areas. The loss of protection not only may reduce recruitment success of the targeted HMS, but also loss of food sources for non-targeted species such as sea birds and rockfish. Consequently, the habitat health of these areas for non-HMS will be degraded.
- **Reducing Bycatch & Ecosystem Damage:** HMS fisheries (e.g., longlines, drift gillnets) often catch non-target species, including threatened and endangered species (leatherback turtles, short-tailed albatross). Furthermore, bycatch often includes species that are key ecosystem engineers (e.g., giant sea bass, which maintain kelp forest health).

Protecting HMS isn't just about saving iconic species—it's about **preserving the ocean's "circulatory system."** Their migrations connect distant ecosystems, making them indispensable to California's marine biodiversity.

B. MRWG Goals - **Socio-Economic & Sustainable Fisheries**

Under the socio-economic and sustainable fisheries goals established by the MRWG, the petitioners request to reclassify select MPAs to alleviate negative impacts on the fisheries for listed highly migratory species[15] would undo the achievements the MPAs have reached. The long-term benefits of maintaining the current level of protection have proven to outweigh the short-term socioeconomic losses that came with establishing the MPAs. For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species

[13] https://www.sciencedirect.com/science/article/abs/pii/S0165783698001787
[14] https://oceanrep.geomar.de/id/eprint/53785/1/4444.pdf
[15] List of State HMS, CPS, and Pelagic finfish per Title 14 CA § 1.49, 1.39, and 632(3): -Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). -Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens). -Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

within the CINMS blocks[16] used in Figure 2. [17] Pre-MPAs (1998-2002), the total value landed for the MPA fishing blocks within the CINMS was 2.899% and the total pounds landed was 4.030%. Post-MPAs (2020-2024), the total value landed for the MPA fishing blocks within the CINMS was 28.980% and the total pounds landed was 45.962%. By pounds and by value, there has been an increase in economic success that followed the establishment of the CINMS MPAs, indicating that opening the MPAs will not necessarily increase the benefit to the HMS fisheries. The return of many species, not just tuna and sharks, cannot be proven to have benefited solely from the establishment of the MPAs. However, the increase in population was and is likely amplified and supported by the MPA network.

[16] See Figure 1 for reference to the fishing blocks used in the analysis.
[17] Displays percentage values calculated by dividing the MPA petition fishing blocks by the CINMS fishing blocks. This was done to assess the economic impacts locally versus comparing the MPA petition fishing blocks to the entire state.

Block ID	Total Pounds	Total Value
707	$869	$4,537
708	$4,480	$15,767
709	$3,624	$16,934
710	$4,813	$6,555
764	$543	$2,632
765	$2,598	$14,079
683	$16,619	$23,693
684	$1,814	$3,364
685	$2,809	$6,680
686	$1,312	$3,564
687	$1,476	$3,454
688	$7,233	$9,766
689	$2,175	$4,742
690	$2,224	$3,346
691	$518	$943
706		Confidential
711	$2,889	$6,868
712	$1,816	$3,518
713	$0	$0
744	$598	$1,199
745		Confidential
Total Petition 2023-15*	$16,927	$60,505
Total CINMS**	$58,409	$131,642
Total All Blocks	**$8,849,117**	**$13,908,685**
Petition/All	0.191%	0.435%
CINMS/All	0.660%	0.946%
Petition/CINMS***	28.980%	45.962%

Table 2.[18] Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 2020- Dec 31, 2024.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

[18] Note “confidential” is data withheld by CDFW.

Block ID	Total Pounds	Total Value
707	$1008	$1279.25
708	$2395.9	$2626.375
709		Confidential
710	$4116.6	$3863.85
764		Confidential
765		Confidential
683	$137,641	$54,943
684	$5,202	$5,709
685	$13,302	$12,537
686	$6,648	$8,923
687	$7,983	$8,005
688	$47,129	$56,320
689	$5,949	$5,380
690	$6,978	$10,696
691	$0	$0
711	$14,381	$17,448
712	$2,009	$1,149
713	$4,705	$3,895
744	$0	$0
745		Confidential
Total Petition 2023-15*	$7520.5	$7769.475
Total CINMS**	$259446.93	$192775.2925
Total All Blocks	**32,150,483**	**$22,954,516**
Petition/All	0.0234%	0.0338%
CINMS/All	0.807%	0.840%
Petition/CINMS***	2.899%	4.030%

Table 3. Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 1998- Dec 31, 2002.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

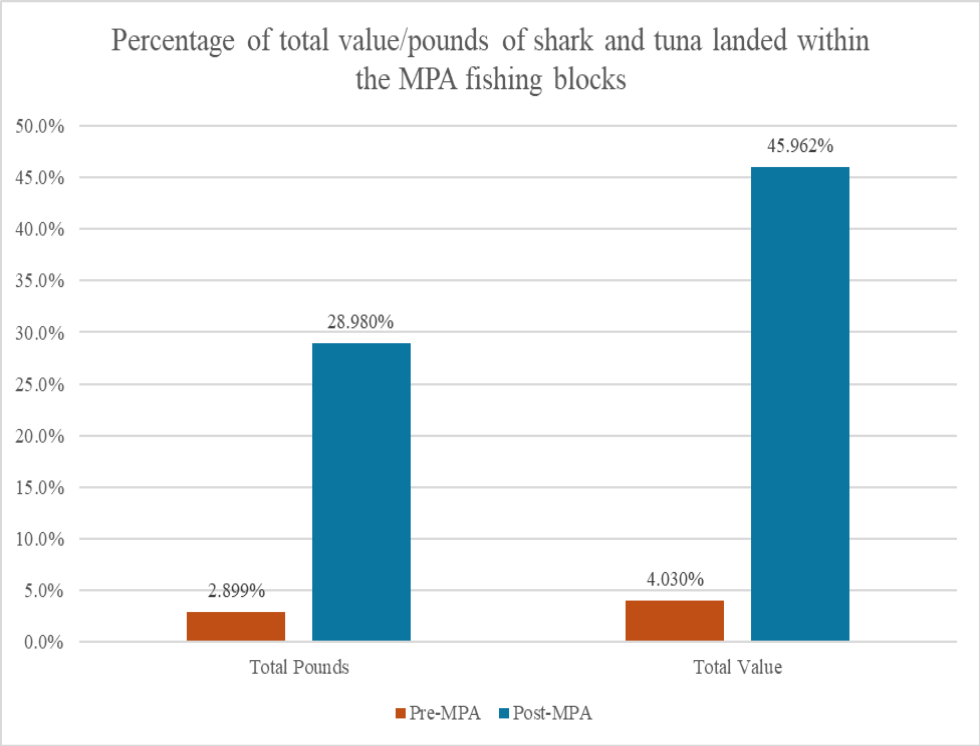


Figure 2. Comparison of Pre-MPA (Jan 1st, 1998- Dec 31st, 2002) and Post-MPA (Jan 1st, 2020- Dec 31st, 2024) total value and total weight by pounds of shark and tuna species landed within the MPA blocks compared to the CINMS fishing blocks.

C. MRWG Goals - **Natural and Cultural Heritage & Education**

An integral component of the CINMS MPAs and the statewide MPA Network is the inclusion of humans. The areas are not only to help conservation and enhance fisheries management, but to provide areas for spiritual, educational, and recreational opportunities.[19] A 2024 survey[20] revealed that 81% of Californians favor expanding MPAs to protect fish, wildlife, and their habitat off the state's coast. Protecting California waters is not only important for the species living in those environments, but also for California ocean users which include non-consumptive uses like beach going, whale watching, photography, surfing, scuba diving, and boating. The Natural and Cultural Heritage Goal and Education goals are intended to maintain areas in the marine environment that give an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically. The petitioners request to open three highly protected MPAs does not support these goals.

[19] 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).
[20] https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2024/

III. CONCLUSION

As California's ocean faces a growing suite of threats from climate change and other human uses, we urge the Commission and CDFW to use its authority to strengthen the MPA network to ensure adequate representation of all key habitats in MPAs so that California's MPA network remains an effective ecosystem-based approach for resilience into the future. To help ensure the network's health rejecting both petition 2023-14 MPA and petition 2023-15 MPA is necessary. Once again, we would like to thank both FGC and CDFW for their dedication to the adaptive management process of California's MPA network.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Rikki Eriksen
Marine Ecologist
California Marine Sanctuary Foundation

Tomas Valadez
California Policy Manager
Azul

Ray Hiemstra
Associate Director of Policy and Projects
Orange County Coastkeeper

Ashley Eagle-Gibbs, Esq.
Executive Director
Environmental Action Committee of West Marin (EAC)

Katie O'Donnell
US Ocean Conservation Manager
WILDCOAST

Zoe Collins
Marine Protected Area Program Coordinator
Heal the Bay

Penny Owens
Education & Community Outreach Director
Santa Barbara ChannelKeeper

From: Blake Hermann <[redacted]>
Sent: Thursday, September 25, 2025 7:27 AM
To: FGC <FGC@fgc.ca.gov>
Cc: Ashcraft, Susan@FGC <[redacted]>; Miller-Henson, Melissa@FGC <[redacted]>; Shuman, Craig@Wildlife <[redacted]>; Newell, Caroline-Contractor@FGC <[redacted]>
Subject: Petition2023-15 comment reply

Hello,

Hope all is going well. Please see attached comment letter for next meeting replying to a letter submitted by 8 eNGOs on Petition2023-15MPA in August. My comments address severe data gaps and severe factual inaccuracies I am disappointed to see in the original letter on Petition2023-15MPA. I felt this must be noted in this process to avoid any future comments restating these data and factual inaccuracies about Petition2023-15MPA. Letter also provides rebuttals to additional claims, and provides unedited data direct from NOAA/NMFS that objectively support petition claims.

Thank you,

Blake H.

The Following is a rebuttal letter to the comments submitted by 8 eNGOs at a previous FGC meeting pertaining to Petition 2023-15MPA. This comment will follow the original comment, provide live counter comments to the arguments presented and provide important contextual data direct from NMFS. This comment is to further elaborate on Patition2023-15MPA and express my concerns that those groups presenting this past comment were misinformed on some of the petition contents and or did not read the petition in its entirety as to what it is requesting.

This is not intended to demean the opinions of those against the petition in any way, but is meant to show, with the broader data, that what the petition requests is not unreasonable, is supported by the MLPA, and are aligned state/federal objectives during this adaptive management process.

For context, the sections of the original comment pertaining to a different petition (Petition2023-14MPA) were removed. Any sections containing counter arguments will be red.

This comment aims to show/reiterate:

- The Petition, if granted will not weaken the MPA network and its connectivity goals for protecting local ecosystems
- The Channel Islands are the most justifiable location to allow for limited pelagic or HMS from both a current network design standpoint and a geospatial standpoint
- The petition does not request any commercial take beyond basic hook-and-line (no net or longline) and has options removing hook-and-line entirely
- The MLPA supports these changes and MRWG goals will still be preserved
- True catch data of HMS clearly shows what little relative impact our MPAs have on the species compared to the larger impacts on local, sustainable fisheries

[Start of Original Comment]

July 31, 2025

Erika Zavaleta
California Natural Resources Headquarters Building
715 P Street, 2nd Floor
Sacramento, CA 95814

Re: Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA

Dear President Zavaleta and Honorable Commissioners:

We would like to begin by thanking the Marine Resource Committee, the full Fish and Game Commission (FGC) and California Department of Fish and Wildlife (CDFW) for their dedication to the adaptive management process of California's MPA network. As the FGC and CDFW continue reviewing the Marine Protected Area (MPA) petitions, we ask that you consider the below arguments against specific petitions looking to weaken* the MPA network. Specifically, the requests of petition 2023-14 MPA to open nine MPAs along the coast to commercial urchin fishing and petition 2023-15 MPA to allow some form of take of highly

migratory species, coastal pelagic species, and/or pelagic finfish at three MPAs at the Channel Islands.

*Regarding the "weakening" of the MPA network. It has been made clear since petition submission that the objective of Petiton2023-15MPA is to still allow high ecosystem level protections in parallel with a limited take of HMS allowance. This is supported by the Department SeaSketch analysis verifying that the preferred changes of the petition result in MPAs with “high levels of protection that still maintain connectivity.” The end result being a network that is just as protected on an ecosystem level that also gives limited and reasonable take of HMS with sustainable fishing methods. This is all publicly verifiable over SeaSketch.

I. The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.

This petition requests opening existing no take reserves—the cornerstone of the MPA Network—to commercial fishing for pelagic species, which encompasses a wide range of species,[9] such as sharks, bill fish, tuna, and mahi mahi in Southern California. The Channel Islands State Marine Reserves (SMRs), and Federal Marine Reserves (FMRs) are among the biggest, oldest and most effective MPAs in the country. Petition 2023-15MPA does not support the goals identified during the planning process for the Channel Islands MPAs, and we therefore request that the FGC and CDFW reject the petition to reclassify three SMRs (Footprint SMR, Gull Island SMR, Santa Barbara Island SMR) in the Northern Channel Islands (NCIs) as SMCAs.

[9] https://www.ecfr.gov/current/title-50/chapter-VI/part-660/subpart-K

The commercial fishing the petition requests are harpoon swordfishing, the most sustainable and clean form of commercial swordfish on the planet, and basic hook-and-line fishing, akin to normal sportfishing methods. There are no net or longline style requests, unlike what is claimed in this letter. The HMS realistically present around the Northern Channel Islands that are available for commercial or sport take would be Bluefin tuna, Swordfish, and mako sharks, with others like mahi mahi or yellowfin rarely present during strong El Nino events. Striped Marlin would be targeted for catch and release by sport boats.
The fact that the NCI MPAs are the oldest in the network justify them the most to be looked at for adaptive management purposes. This is especially the case for pelagic/HMS allowed areas because the NCI MPAs see little to no pelagic or HMS allowed areas compared to the remainder of the state network made after the NCI process. The NCI MPAs are held to the same standards as the other MPAs in the modern network and are governed by the MPA Master Plans which clearly state to have pelagic allowed regions in the regional objectives (goals) of the Master plans. As the NCI MPAs were designated before any of these guiding documents and contain noticeably low levels of pelagic allowed areas compared to everywhere else it is more than reasonable to consider this adaptive management measure to update the NCI MPAs to the same standards we see elsewhere in the network.

Established in 2003 after the Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC), the Marine Reserves Working Group (MRWG) came up with goals for MPAs at the Channel Islands. The MRWG's goals stated the following:

> (1) Ecosystem Biodiversity Goal: To protect representative and unique marine habitats, ecological processes, and populations of interest; (2) Socio-Economic Goal: To maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties; (3) Sustainable Fisheries Goal: To achieve sustainable fisheries by integrating marine reserves into fisheries management; (4) Natural and Cultural Heritage Goal: To maintain areas for visitor, spiritual, and recreational opportunities which include cultural and ecological features and their associated values; and (5) Education Goal: To foster stewardship of the marine environment by providing educational opportunities to increase awareness and encourage responsible use of resources.[10]

We utilized the goals and reasonings from the "Final 2002 Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary" as the Channel Islands state and federal MPAs pre-date the Marine Life Protection Act and subsequent establishment of the statewide MPA network. Approval of this petition would be inconsistent with these goals for the following reasons.

The fact that the original process and working groups were designated the Marine Reserves Working Group displays the shift between the NCI and more modern MLPA processes. Both focus on ecosystem protections but the NCI process, being first, is naturally reserve heavy, as the island network was the first of its kind to go in. Now that we have a broader state network, and a better understanding of MPAs and pelagic fisheries we can justifiably partially open some NCI reserves to HMS like we clearly see in the rest of the network that is based on more-modern data.

A. MRWG Goal - **Ecosystem Biodiversity**

The establishment of the Channel Islands MPAs was, "To protect representative and unique marine habitats, ecological processes, and populations of interest," which has translated to the goals and intent of the statewide MPA Network*. Past petitions requesting to establish MPAs to protect a singular species have been denied by the FGC. For example, in 2020-2021 the FGC denied a petition requesting for the creation of an MPA for White Sharks near Carpentaria reasoning, "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species."[11] The intent of California MPAs remains to protect all aspects of an ecosystem (ecosystem-wide protection), not one species. Consequently, opening an MPA for one species should also be rejected**.

*The original goals of the NCI were largely applied to the state network that came after the NCI MPA designation process. Both networks' objectives were to protect ecosystems. Ecosystem level protection was defined under the level of protection and MPA connectivity frameworks that came after the NCI process, and while both networks accomplish the same general goals, look at the vast differences in pelagic allowances between them. Clearly if the more-modern coastal network made 40% of its areas limited take for mostly pelagic fish and maintains ecosystem level protection the NCI MPAs can be revisited and reconsidered in light of this change in MPA management

and HMS fisheries. Under the petition's preferred changes there are no resulting changes in connectivity as MPA's all retain their high levels of protection. This is because pelagic and especially HMS fishing activity, under sustainable and clean fishing methods, do not impact the essential local ecosystems the MPAs are primarily intended for, as interactions between pelagic fisheries and homebody species like groundfish or bass are next to impossible. For fisheries like spear or harpoon they are impossible unless the angler knowingly breaks the law. Department frameworks like the LOPs and connectivity requirements for ecosystem protection are clear, under an accepted petition, the ecosystem is still more than protected and connectivity preserved..

**As mentioned above, ecosystem level protections are a key in this process. It is unfavorable to propose changes that reduce network connectivity by introducing fishing methods that are either too intensive, or take species the MPA network works best for, petition2023-15MPA does not remove ecosystem level protections or any network connectivity.
The commission's decision to not grant a new MPA for Great White Sharks on the grounds that they are an HMS and are not affected by MPAs meaningfully enough on their own to justify an MPA is a prime example on why the petition should be allowed and sets a clear precedent, HMS are not meaningfully affected by MPAs. This fact is already supported by both 2008 and 2016 MMPs. Following that precedent we can still protect other species in these areas (non-HMS) and allow take of HMS while still protecting the local ecosystem, this is exactly what Petition2023-15MPA proposes. If "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species," then we surely can allow for HMS take in a sector of the network that currently allows 10x less pelagic allowed areas (by relative percentage) and still protect the local ecosystem the HMS are just passing through. The logic of opening an MPA to specifically HMS is clearly supported by this so long as the ecosystem the MPA is aiming to protect remains protected, and under the LOP and Seasketch connectivity guidelines it all is still protected under an accepted petition.

[10] 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).
[11] California Department of Fish and Wildlife (2022). Decadal Management Review: Appendix G Supplemental Tables.

July 31, 2025
Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA

The petitioner makes the argument that opening Footprint SMR, Gull Island SMR, Santa Barbara Island SMR to fishing pressure would have no significant impact on non-migratory species within the MPAs. However, the increase in boat traffic through the previously closed areas would introduce noise pollution, potential derelict fishing gear, water pollution, etc. The added complexities in the individual MPAs regulations will also increase the hardship on enforcement. Additionally, the same reasons cited to open these MPAs to highly migratory species are also the reasons why we believe it is unnecessary to do so.

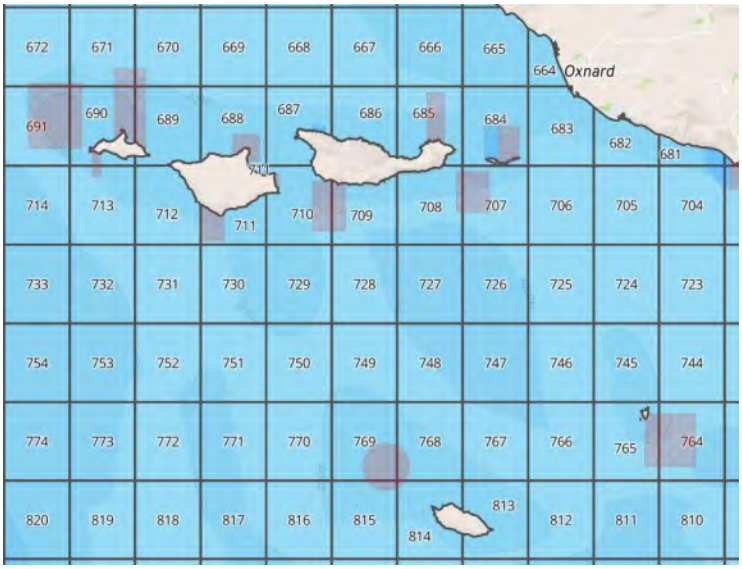
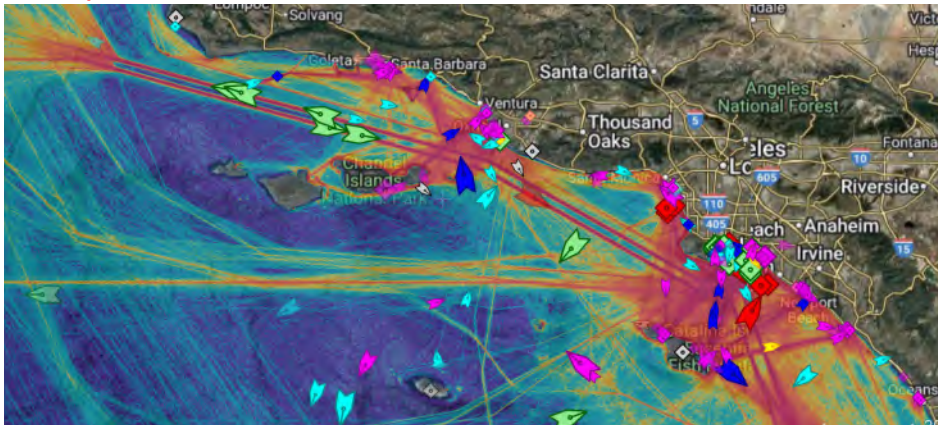


Figure 1. Seasketch Map using layers “Commercial Fishing Blocks” and “Existing Marine Protected Areas (MPAs)”

Regarding “noise pollution” in MPAs. See attached heat map image of boat traffic tracked via AIS in the SCB. Pelagic effort on the southern side of the 4 northern NCI in the normal pelagic fishing grounds shows very low traffic saturation (blue/green). The opening of the three MPAs in question will not see a shift in intense traffic as there is no clear higher level of traffic outside of the proposed areas vs inside along the south side of the 4 northern islands in the pelagic fishing grounds. Essentially there are no clear “traffic boundaries” for MPA as there is clearly not less traffic inside of them. Regarding “noise pollution” in general the Scorpion SMR and Anacapa MPAs actually see some of the most traffic and therefore “noise pollution” yet there have been no alarms raised there. That being the case there should be no concern for noise if some fishing is allowed in the three proposed MPAs as any traffic would be minimal relative to apparent noise present in several no-take and limited take areas elsewhere.



Regarding lost fishing gear, as the proposed methods involve pelagic/HMS fisheries that are all non-bottom contact in general the risk of gear being snagged or abandoned are low for hook-and-line which would consist mainly of troll or surface casting methods for tuna or billfish, which again, is minimal in its gear loss rates compared to bottom fishing. Harpoon and spear gears are also relatively never lost, and have minimal footprints compared to H&L as neither are deployed until a fish is taken.

Regarding water pollution, the act of fishing in these areas specifically for HMS does not create additional risks to water pollution that ordinarily exist when fishing for HMS outside of these areas. The "threat" of pollution exists in the surrounding area regardless of if they are open or not.

Added allowances in MPAs always makes enforcement more difficult. However, if enforcement has no issue enforcing the remainder of the MPA network that is already 40% limited take, which it claims it has no problems. The same areas at the NCI should pose no difference in how the areas are enforced. Speaking to the local wardens when out on the water and those at state offices also confirmed this claim.

1. Reasons Why MPAs Protect Highly Migratory Species

Protecting highly migratory species (HMS) like tunas, sharks, and billfish in California waters plays a critical role in maintaining healthy marine ecosystems through trophic cascades, nutrient cycling, and habitat connectivity.

Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition.[12] A sharp decline of large pelagic fish (species such as sharks, swordfishes, marlins, and tuna) that roam the open sea and play vital roles as predators leads to impacts on local, regional and large-scale ecosystem dynamics. Fishing undermines MPA effectiveness which leads to target species depletion, leading to their inability to recover even within MPAs. The risk of bycatch on unintended species is high and unaccounted for, leading to ineffectiveness of the local MPA for all other components of the ecosystem.

[12] https://www.sciencedirect.com/science/article/abs/pii/S0308597X18301866?via%3Dihub.

MPAs do protect HMS when they do pass through; however, if that protection actually helps the species is what is up to debate. Stating "Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition,[12]" inherently poses this question of can it make a difference? Considering 40% of the remaining network has a limited pelagic allowance suggests that an allowance at the NCI which lacks said allowance is justifiable. In the MLPA it was determined HMS/pelagic species we not meaninfully affected enough. Today, in the cited ScienceDirect article, it concludes, "We conclude that (1) many species with known migration routes, aggregating behavior, and philopatry can benefit from spatial protection; but (2) spatial protection alone is insufficient and should be integrated with effective fisheries management to protect and rebuild stocks of highly migratory species." This conclusion is clear, while some benefits may exist, the MPA benefits alone are insufficient, essentially restating what was already known during the MLPA, our small sized network (relatively speaking on the HMS scale) does not

really affect them. Therefore we can allow reasonable take of HMS or pelagic while still protecting our ecosystems. While there are possible MPA benefits to species in certain cases these benefits along from MPAs are still insufficient for HMS that span the globe, far exceeding our MPA boundaries. This is why we have actual pelagic fishery management measures with seasons and quotas for HMS compared to MPAs that may or may not contain them at a given time.

It should be especially noted that per the NMFS provided global catch data located at the end of this analysis for the two most relevant HMS in this petition, swordfish and bluefin tuna, the entire fraction of taken fish inside of domestic waters as a whole on the west coast is a drop in the bucket to what is taken internationally from the same stocks. As these fish migrate into international waters in the winter/spring for 6-8 months, they are simply hit with significantly higher levels of take on pelagic longline. Simply put, our local HMS fisheries do nothing compared to international longline fleets that take a bulk of the same HMS that we attempt to protect with local MPAs. Because of this, we must give local, cleaner fleets the most opportunity to provide what they can by allowing take in these areas that are largely not helping the HMS that pass through.

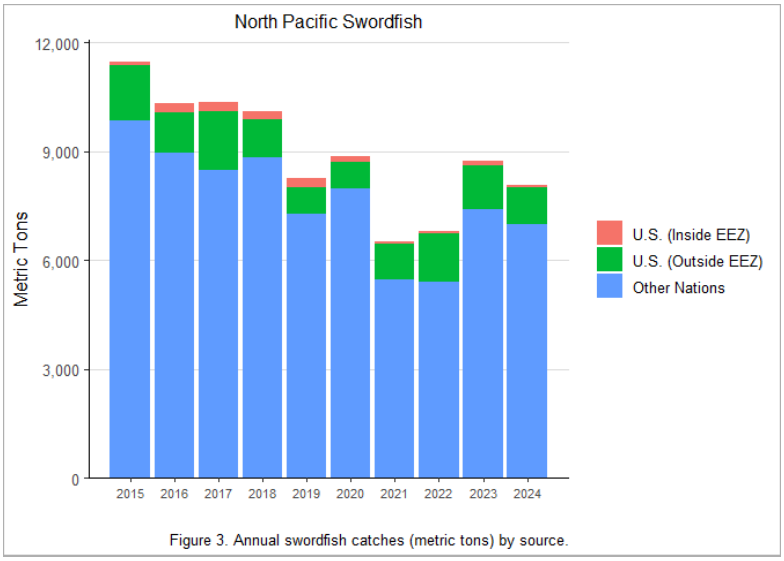


Figure 3. Annual swordfish catches (metric tons) by source.

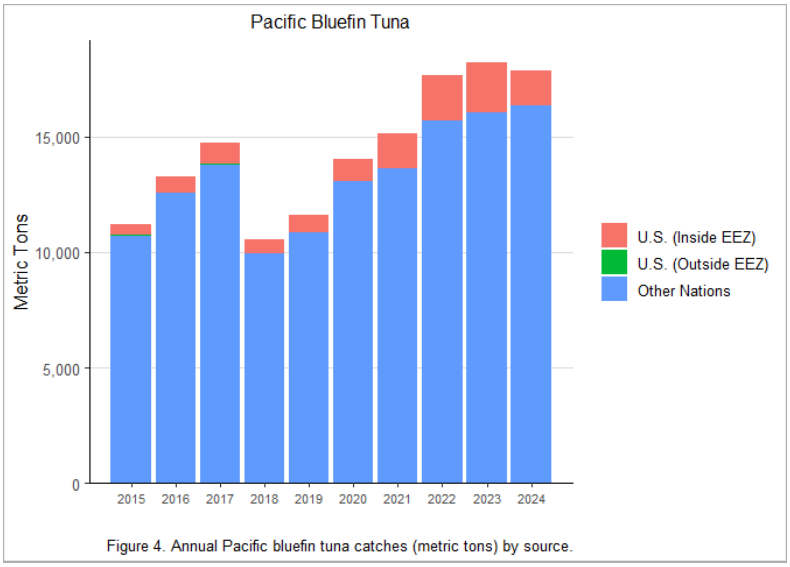


Figure 4. Annual Pacific bluefin tuna catches (metric tons) by source.

Snapshots of total landings of swordfish and bluefin tuna (recreational and commercial combined) provided directly by NMFS. Our entire recreational and commercial landing totals locally are represented by the orange/beige boxes. In international waters US vessel take is green, and remaining international take blue. The results are quite clear, locally (inside of 250 nautical miles) our fleets take small fractions of these species stocks. You can barely even see the swordfish we take locally along the entire coast, let alone at the NCI. Any protections these HMS may have locally are negligible in this regard and access should be granted in areas that can accommodate some level of local take in a region of the MPA network that came before all the Master Plans that laid this information out.

2. Maintaining Trophic Balance (Top-Down Control)

- **Predator-prey dynamics:** HMS like bluefin tuna, mako sharks, and swordfish are apex predators that regulate mid-level species (e.g., squid, small fish). Their decline can trigger population explosions of prey species, disrupting food webs. For example, overfishing sharks in Southern California has been linked to increased cephalopod (squid/octopus) populations, which then overconsume shellfish and crustaceans.[13,14]
  If any overfishing exists on these stocks that are domestically and internationally recognized as "not overfished" by NOAA and IATTIC, the "overfishing" occurs in international waters on the pelagic longlines that take an overwhelming majority of the stock. (See NMFS catch data above (charts) and at the end of the document (full report))
- **Nutrient Cycling:** Migratory species transport nutrients across vast distances. When they feed in deep waters and excrete near the surface, they fertilize phytoplankton (the base of the marine food web), delivering valuable nutrients to MPAs. In addition, highly migratory species such as tunas and billfish contribute to the "biological carbon pump" by moving nutrients vertically, as part of benthic pelagic linkages, which enhances ocean productivity.
  Nutrient cycling will continue to occur regardless if these areas are open or not. A fish excrement occurring inside or outside of an MPA participates in this cycle. If the concern is less fish will be doing it, again reference the international longline vs inside EEZ catch data on fisheries meaningfully affecting the global stock (the northeastern pacific stock of billfish and tuna).
- **Protecting Spawning & Nursery Grounds:** Many HMS rely on offshore areas such as the MPAs for spawning and recruitment areas. The loss of protection not only may reduce recruitment success of the targeted HMS, but also loss of food sources for non-targeted species such as sea birds and rockfish. Consequently, the habitat health of these areas for non-HMS will be degraded.
  It has been well established that both billfish and tuna visit the Southern California Bight (SCB) to feed, not spawn. Spawning occurs hundreds of miles offshore outside the reach of any of our local MPAs in warmer waters. The idea of protecting nursery grounds follows the same logic of an MPAs effect on an HMS, fully grown or still growing, our local MPAs have little effect.
- **Reducing Bycatch & Ecosystem Damage:** HMS fisheries (e.g., longlines, drift gillnets) often catch non-target species, including threatened and endangered species (leatherback turtles, short-tailed albatross). Furthermore, bycatch often includes species that are key ecosystem engineers (e.g., giant sea bass, which maintain kelp forest health).
  This is the only point I, as the petitioner, take personal offense to. The petition is very clear in the methods it proposed being allowed: recreational spear, commercial harpoon, and general hook-and-line. Nowhere is there mention of allowing gill net or longline methods, longline is not even allowed within 220 miles of land. Harpoon swordfish and recreational spear are quite literally zero-bycatch fisheries and pelagic hook-and-line has minimal bycatch at best. To insinuate that bycatch is a potential major issue here, especially for something like giant seabass or endangered seabirds/turtles is factually incorrect, and makes myself question the fact if the accusers either did not understand or did not read the petition in its entirety before commenting this unfounded allegation.

Protecting HMS isn't just about saving iconic species—it's about **preserving the ocean's "circulatory system."** Their migrations connect distant ecosystems, making them indispensable to California's marine biodiversity.

It is well established that the protections HMS receive while passing through these MPAs on the currents are minimal at best. An allowance in these three areas will not revolutionize the fishery by any means, it would just give more area back for anglers to try to find HMS inside of. For a set of species (HMS) that are predominantly taken far offshore on longline, there should be no reason to allow this small level of additional take locally in areas that offer fishable conditions. We already do this everywhere else in the more modern network, we must now do the same at the NCI where this was overlooked.

B. MRWG Goals - **Socio-Economic & Sustainable Fisheries**

Under the socio-economic and sustainable fisheries goals established by the MRWG, the petitioners request to reclassify select MPAs to alleviate negative impacts on the fisheries for listed highly migratory species[15] would undo the achievements the MPAs have reached. The long-term benefits of maintaining the current level of protection have proven to outweigh the short-term socioeconomic losses that came with establishing the MPAs. For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species within the CINMS blocks[16] used in Figure 2. [17] Pre-MPAs (1998-2002), the total value landed for the MPA fishing blocks within the CINMS was 2.899% and the total pounds landed was 4.030%. Post-MPAs (2020-2024), the total value landed for the MPA fishing blocks within the CINMS was 28.980% and the total pounds landed was 45.962%. By pounds and by value, there has been an increase in economic success that followed the establishment of the CINMS MPAs, indicating that opening the MPAs will not necessarily increase the benefit to the HMS fisheries. The return of many species, not just tuna and sharks, cannot be proven to have benefited solely from the establishment of the MPAs. However, the increase in population was and is likely amplified and supported by the MPA network.

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[13] https://www.sciencedirect.com/science/article/abs/pii/S0165783698001787
[14] https://oceanrep.geomar.de/id/eprint/53785/1/4444.pdf
[15] List of State HMS, CPS, and Pelagic finfish per Title 14 CA § 1.49, 1.39, and 632(3): -Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). -Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens). -Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).
[16] See Figure 1 for reference to the fishing blocks used in the analysis.
[17] Displays percentage values calculated by dividing the MPA petition fishing blocks by the CINMS fishing blocks. This was done to assess the economic impacts locally versus comparing the MPA petition fishing blocks to the entire

Block ID	Total Pounds	Total Value
707	$869	$4,537
708	$4,480	$15,767
709	$3,624	$16,934
710	$4,813	$6,555
764	$543	$2,632
765	$2,598	$14,079
683	$16,619	$23,693
684	$1,814	$3,364
685	$2,809	$6,680
686	$1,312	$3,564
687	$1,476	$3,454
688	$7,233	$9,766
689	$2,175	$4,742
690	$2,224	$3,346
691	$518	$943
706		Confidential
711	$2,889	$6,868
712	$1,816	$3,518
713	$0	$0
744	$598	$1,199
745		Confidential
Total Petition 2023-15*	$16,927	$60,505
Total CINMS**	$58,409	$131,642
Total All Blocks	**$8,849,117**	**$13,908,685**
Petition/All	0.191%	0.435%
CINMS/All	0.660%	0.946%
Petition/CINMS***	28.980%	45.962%

Table 2.[18] Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 2020- Dec 31, 2024.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

(See end of data)

[18] Note “confidential” is data withheld by CDFW.

Block ID	Total Pounds	Total Value
707	$1008	$1279.25
708	$2395.9	$2626.375
709		Confidential
710	$4116.6	$3863.85
764		Confidential
765		Confidential
683	$137,641	$54,943
684	$5,202	$5,709
685	$13,302	$12,537
686	$6,648	$8,923
687	$7,983	$8,005
688	$47,129	$56,320
689	$5,949	$5,380
690	$6,978	$10,696
691	$0	$0
711	$14,381	$17,448
712	$2,009	$1,149
713	$4,705	$3,895
744	$0	$0
745		Confidential
Total Petition 2023-15*	$7520.5	$7769.475
Total CINMS**	$259446.93	$192775.2925
Total All Blocks	**32,150,483**	**$22,954,516**
Petition/All	0.0234%	0.0338%
CINMS/All	0.807%	0.840%
Petition/CINMS***	2.899%	4.030%

Table 3. Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 1998- Dec 31, 2002.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks

(See end of data).

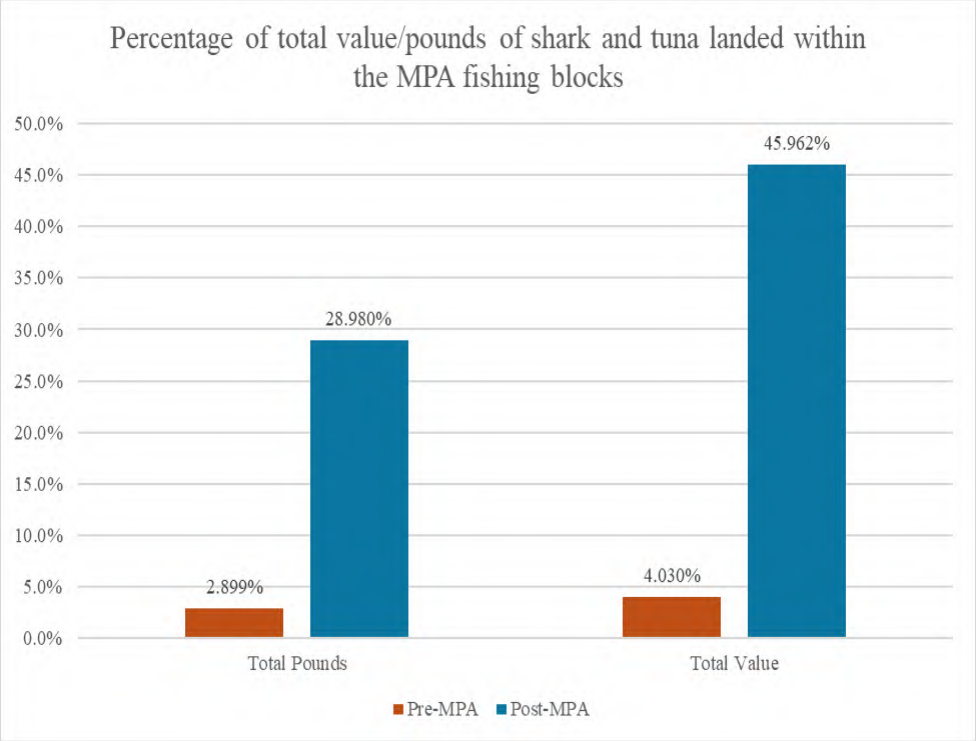

Figure 2. Comparison of Pre-MPA (Jan 1st, 1998- Dec 31st, 2002) and Post-MPA (Jan 1st, 2020- Dec 31st, 2024) total value and total weight by pounds of shark and tuna species landed within the MPA blocks compared to the CINMS fishing blocks.

There are several concerns this data brings to light.

-The lack of HMS filtering making the "shark" category count the hundreds of thousands of pounds of non-pelagic sharks landed at the islands in the early 2000s by gillnet (brown, angel, smoothhound, leopard, and soupfin sharks all fall into non-pelagic categories). This significantly skews the data to show less relative percent of species that are not even HMS or pelagic being taken in the CINMS, not adjacent to MPAs.

-The comparison of pre and post MLPA data where half the block data for pre-MLPA is allegedly confidential sways results very positively in the arguments favor on a percent basis, where the true values are certainly much closer.

-Plugging in the same parameters (non-pelagic sharks included and not included) in the MFDE yields significantly different numbers and non-confidential values where confidential values allegedly were in the early 2000s for blocks 709, 764, and 765.

-The lack of billfish (swordfish) in the landing analysis which would locally see the largest amount of relative take.

C. MRWG Goals - **Natural and Cultural Heritage & Education**

An integral component of the CINMS MPAs and the statewide MPA Network is the inclusion of humans. The areas are not only to help conservation and enhance fisheries management, but to provide areas for spiritual, educational, and recreational opportunities.[19] A 2024 survey[20] revealed that 81% of Californians favor expanding MPAs to protect fish, wildlife, and their habitat off the state's coast. Protecting California waters is not only important for the species living in those environments, but also for California ocean users which include non-consumptive uses like beach going, whale watching, photography, surfing, scuba diving, and boating. The Natural and Cultural Heritage Goal and Education goals are intended to maintain

areas in the marine environment that give an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically. The petitioners request to open three highly protected MPAs does not support these goals.

Regarding these 3 MPAs in the specific petition, none see any relative non-consumptive use. Due to their offshore natures we see zero beachgoing, or surfing. Limited to no whale watching or scuba diving occurs in these MPAs due to more favorable regions that are nearshore (scuba) or in the northern santa barbara channel (whale watching). All mentioned activities are unaffected by a change such as this for pelagic species as well.

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[19] 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).

[20] https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2024/

II. CONCLUSION

As California's ocean faces a growing suite of threats from climate change and other human uses, we urge the Commission and CDFW to use its authority to strengthen the MPA network to ensure adequate representation of all key habitats in MPAs so that California's MPA network remains an effective ecosystem-based approach for resilience into the future. To help ensure the network's health rejecting both petition 2023-14 MPA and petition 2023-15 MPA is necessary. Once again, we would like to thank both FGC and CDFW for their dedication to the adaptive management process of California's MPA network.

Sincerely,
~~Azsha Hudson~~
~~Marine Conservation Analyst & Program Manager~~
~~Environmental Defense Center~~

~~Rikki Eriksen~~
~~Marine Ecologist~~
~~California Marine Sanctuary Foundation~~

~~Tomas Valadez~~
~~California Policy Manager~~
~~Azul~~

~~Ray Hiemstra~~
~~Associate Director of Policy and Projects~~
~~Orange County Coastkeeper~~

~~Ashley Eagle-Gibbs, Esq.~~
~~Executive Director~~
~~Environmental Action Committee of West Marin (EAC)~~

~~Katie O'Donnell~~
~~US Ocean Conservation Manager~~
~~WILDCOAST~~

~~Zoe Collins~~
~~Marine Protected Area Program Coordinator~~
~~Heal the Bay~~

~~Penny Owens~~
~~Education & Community Outreach Director~~
~~Santa Barbara ChannelKeeper~~

Signatures crossed out as this is not their direct comment.

[End of Original Comment]

[NMFS Data report. The report will not be in red but additional comments will be.]

HMS Catches by Area

NMFS West Coast Region

05 September 2025

The goal of this data summary is to compare catches of key highly migratory species (HMS) within the U.S. West Coast Exclusive Economic Zone (EEZ; meaning Federal waters offshore of California, Oregon, and Washington) to catches outside the EEZ. Catches outsize the EEZ include U.S. vessels fishing on the high seas as well as catches by foreign fleets who fish on the same stocks. Data are presented for the past ten years, 2015-2024.

The species included are North Pacific albacore, bluefin tuna, and swordfish.

The source for these data are the annual catch tables published by the International Scientific Committee for Tuna and Tuna-like Species (ISC).

The primary species to be looked at through the petition lens are Bluefin Tuna and Swordfish as those two species would experience the highest levels of sport and commercial effort take in these areas if the petition is allowed. Striped marlin would see the highest sport effort overall, but that is all primarily catch and release.

This chart, which appears in the Pacific Fishery Management Council's annual HMS SAFE reports, shows total catch of each species by countries which harvest North Pacific stocks of HMS.

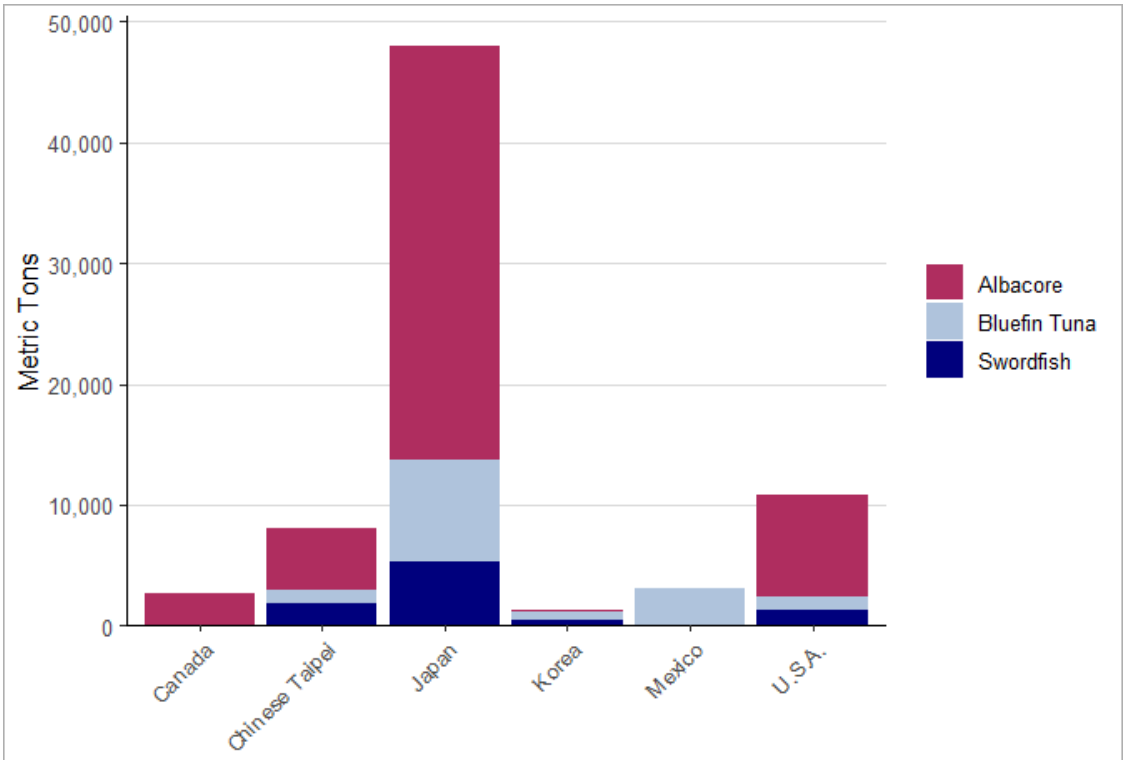

Figure 1. Annual average catch (metric tons) by species and country.

The following chart focuses on albacore, displaying catch by each country over the past 10 years. Note that in past years the U.S. and Canada have utilized a reciprocal access treaty allowing each country to fish and land in the other's EEZ. Therefore the catches by U.S.A. and Canada both may occur in the U.S. EEZ or in Canadian waters.

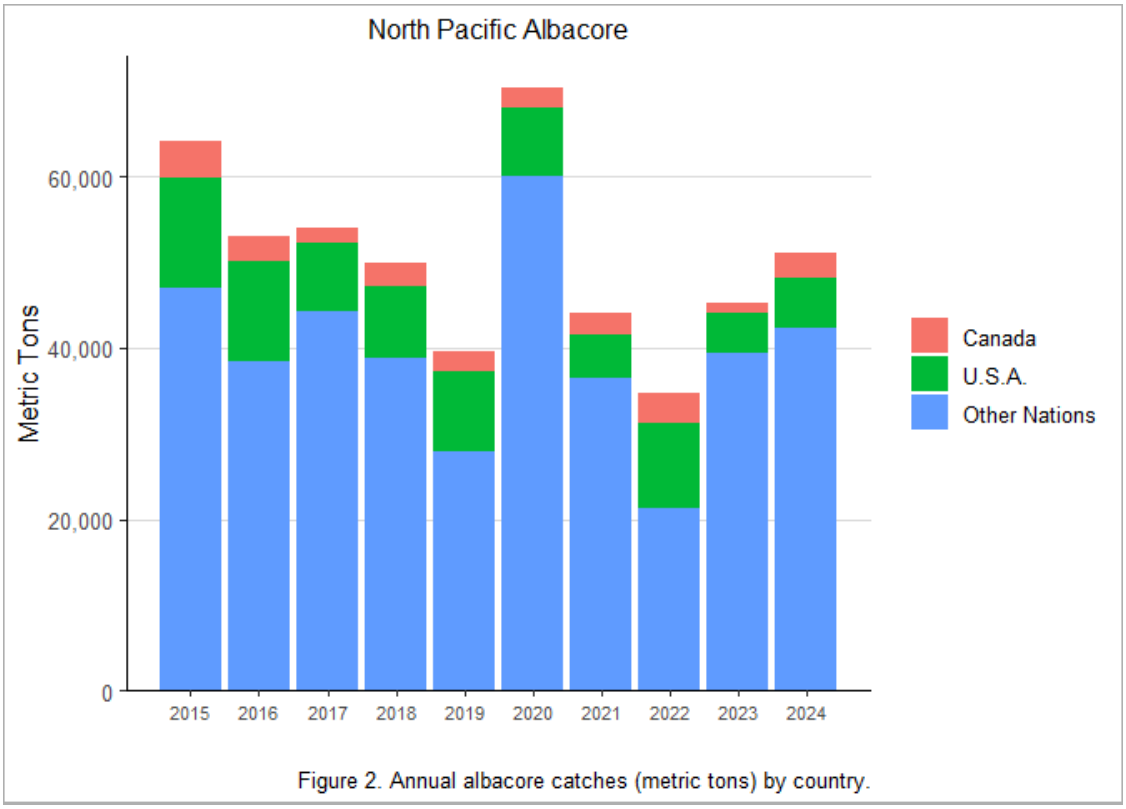

Figure 2. Annual albacore catches (metric tons) by country.

The following chart focuses on swordfish. For U.S. fisheries, longline gear fishes outsize the U.S. West Coast EEZ, while other gears (DSBG, harpoon, hook-and-line, and DGN) fish inside the EEZ.

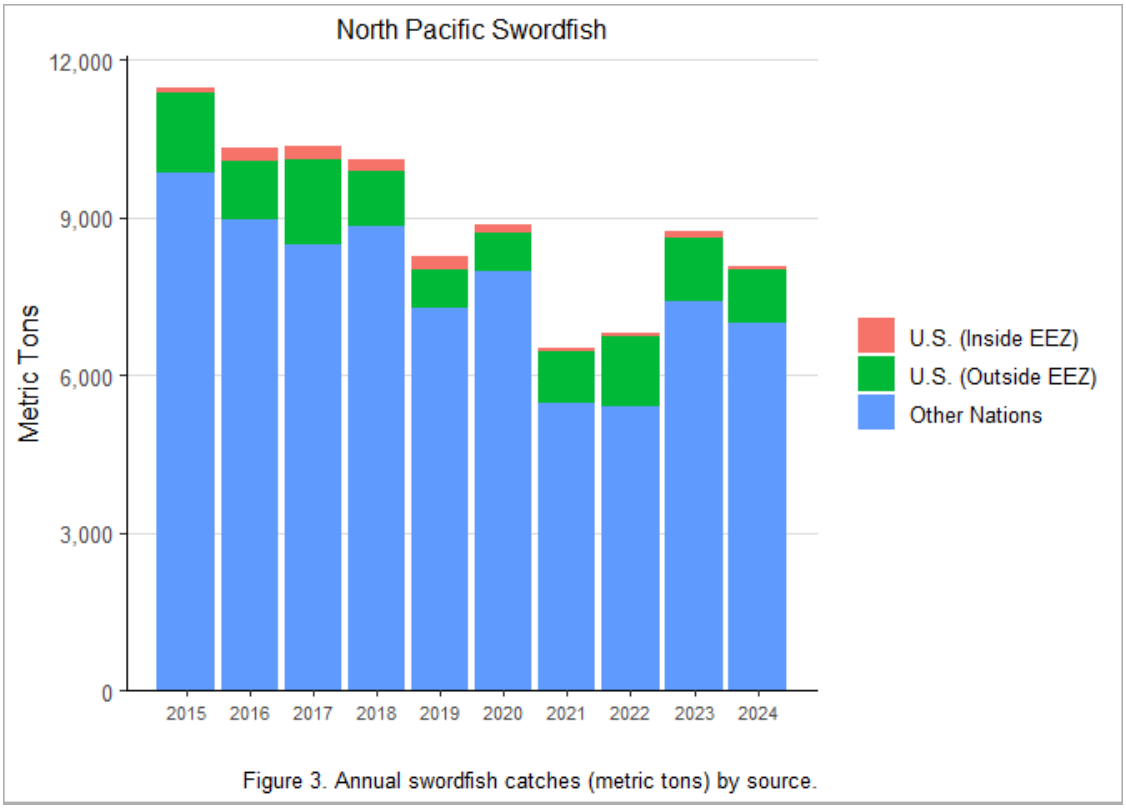

Figure 3. Annual swordfish catches (metric tons) by source.

Note that locally with harpoon, hook-and-line, DSBG, and gill net fisheries we locally take extremely little swordfish relative to what is taken from the stock each year, you can barely see what our local fisheries take. Of all these local fisheries, gill net is the traditionally highest yield fishery for swordfish. As this method is not allowed in the petition, only harpoon and hook-and-line are, we can clearly infer from the NMFS data that any additional swordfish taken in these areas will not affect the stock at all, and relatively speaking, are negligible in the grand scheme of things.

The following chart focuses on Pacific bluefin tuna. Almost all U.S. catches of domestically caught bluefin are from gears which fish inside the EEZ (purse seine, hook-and-line, and DGN). Also included are sport fishing catches by U.S. recreational boats, which comprise the majority of U.S. bluefin catch in recent years. A small amount of bluefin is also caught incidentally by longliners fishing outside the EEZ.

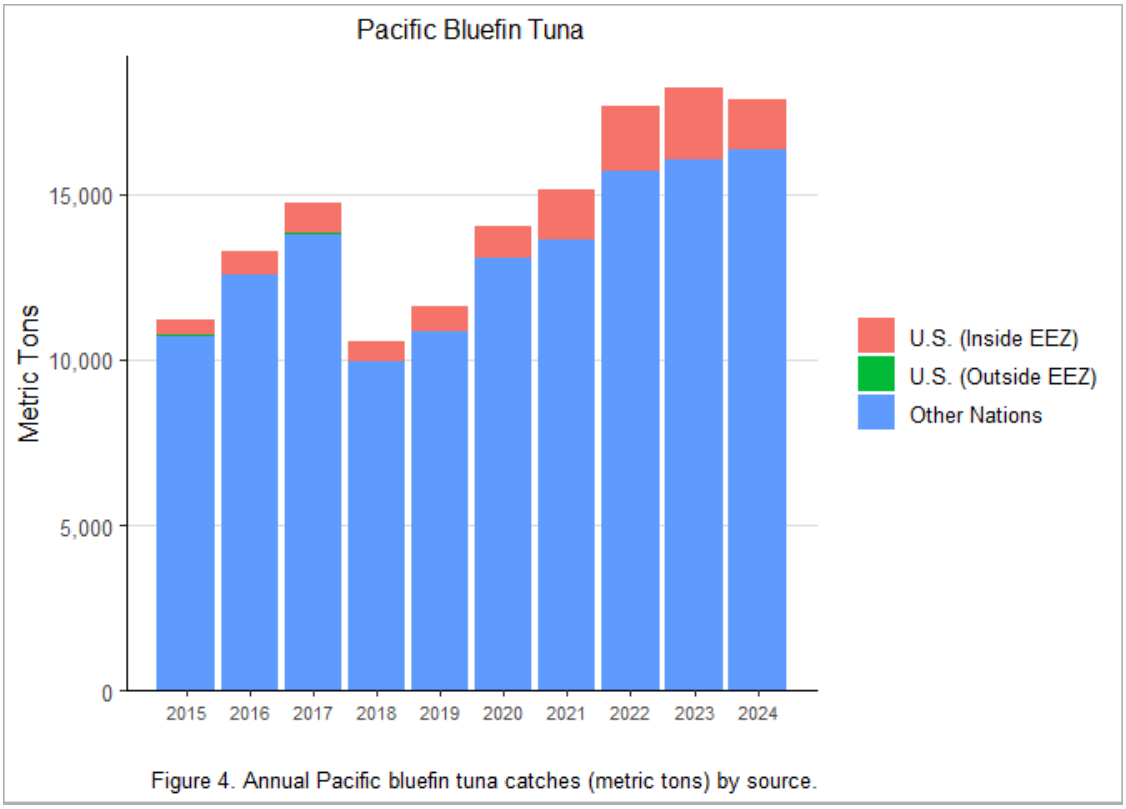

Figure 4. Annual Pacific bluefin tuna catches (metric tons) by source.

Bluefin tuna sees a higher level of relative take than swordfish when it comes to local fisheries. As the data mentions, of what is taken locally a majority is sportfishing. Sportfishing of bluefin tuna would be allowed under the petition however the added area relative to the entire coast's level of take is extremely small. Any additional level of take would still see our local take levels remain well in the minority of what is taken globally.

Everything in this summary should be cited as follows:

International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean (ISC). 2024 annual catch tables. Available from: https://isc.fra.go.jp/fisheries_statistics/index.html. Accessed on: September 2, 2025. Data summary and visualization provided by National Marine Fisheries Service (NMFS) West Coast Region staff. All data are subject to updates and corrections.

Overall, what the data shows is clear, what is taken locally is relatively very little to what is taken globally from these HMS stocks, especially for swordfish. Under an accepted petition the level of take locally even if it rises would be insignificant to the scale that these HMS are currently being taken at.

Thank you,
Blake Hermann
Petitioner Petition2023-15MPA

FGC@FGC

From:	Azsha Hudson <ahudson@environmentaldefensecenter.org>
Sent:	Friday, October 3, 2025 11:54 AM
To:	FGC
Cc:	Samantha Murray; fgcericsklar@gmail.com; commissioner.zavaleta@gmail.com; commissionerdariusanderson@gmail.com; jhostler@trinidadrancheria.com; Maggie Hall
Subject:	Submission for FGC Supplemental Deadline
Attachments:	2025_10_02_Clarification re Petitioner 2023-15MPA_FINAL.pdf; 2025_07_25_MRC Opposed re MPA Petitions_FINAL.pdf

Hello,

Please see the attached letters for the upcoming Oct 8-9 FGC meeting.

Please note that one of the letters dated July 25th, was previously sent in July for the July MRC meeting. The second Dated for October is a clarification to a recently submitted rebuttal letter from the Petitioner for 2023-15MPA.

Thank you.

AZSHA HUDSON (she/her/hers)
MARINE CONSERVATION ANALYST & PROGRAM MANAGER
906 Garden Street
Santa Barbara, CA 93101
o: 805.963.1622 X 105 c: 805.263.7071
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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.

July 31, 2025

Erika Zavaleta
California Natural Resources Headquarters Building
715 P Street
2nd Floor
Sacramento, CA 95814

Re: <u>Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023-15MPA</u>

Dear President Zavaleta and Honorable Commissioners:

We would like to begin by thanking the Marine Resource Committee, the full Fish and Game Commission (FGC) and California Department of Fish and Wildlife (CDFW) for their dedication to the adaptive management process of California's MPA network. As the FGC and CDFW continue reviewing the Marine Protected Area (MPA) petitions, we ask that you consider the below arguments against specific petitions looking to weaken the MPA network. Specifically, the requests of petition 2023-14 MPA to open nine MPAs along the coast to commercial urchin fishing and petition 2023-15 MPA to allow some form of take of highly migratory species, coastal pelagic species, and/or pelagic finfish at three MPAs at the Channel Islands.

I. <u>The FGC and CDFW Should Reject PETITION 2023-14MPA- Opening Sea Urchin Harvest to Commercial Fishermen Within Existing Marine Protected Areas.</u>

The decline of kelp forest ecosystem is due to many factors, including a significant increase in purple urchins, which leads to urchin barrens where vibrant kelp forests once existed. Petition 2023-14 MPA requests that nine existing MPAs from the North to the South Coast be opened for commercial urchin fishing for economic reasons. We request that the FGC and CDFW reject this petition to open multiple State Marine Conservation Areas (SMCAs) (Double Cone Rock SMCA, Sea Lion Cove SMCA, Stewart's Point SMCA, Salt Point SMCA, Naples SMCA, Anacapa Island SMCA, Point Dume SMCA, Point Vicente SMCA (no-take), Swami's SMCA) to allow commercial take of sea urchins to aid in kelp forest restoration. First, any benefits of this petition are outweighed by the considerable costs to the MPA goals and environment of allowing commercial urchin fishing in MPAs. Second, the lack of clarity by the petitioner as to which species of urchin would be commercially fished is concerning. Third,

using SeaSketch to determine habitat connectivity under the petitioners' request would see the loss in connectivity in multiple habitats.

A. Benefits and Cost Synthesis

The benefits and costs of harvesting sea urchins within MPAs in California are complex, involving ecological, economic, and management trade-offs. Here is a synthesis of key points.

1) **Scientific Disagreement and Uncertainty**: The trophic dynamics of predator-prey relationships for urchins within California are poorly understood and vary region to region. In Northern California, where purple urchin overpopulation has devastated kelp forests (creating "urchin barrens"), targeted harvesting has been used to aid kelp recovery. Projects like the Giant Kelp Restoration Project involved culling urchins, which allowed kelp to regrow in some areas. However, this project was highly restricted and regulated to minimize damage to the ecosystem while targeting the purple urchin using trained divers. The challenges and importance of regulating harvest within MPAs have been researched in the Mediterranean, with similar findings for the need to restrict and oversee any management interventions such as this.[1]
2) **Ecological Disruption**: MPAs are designed to protect trophic cascades, where predators (e.g., lobsters, sheephead, sea otters) control urchin populations, indirectly safeguarding kelp forests. Harvesting urchins—or their predators—can disrupt this balance, leading to kelp loss and habitat degradation. Currently, within California there is scientific uncertainty about the conditions under which urchin harvest will benefit or harm the marine ecosystem.[2]
3) **Undermines MPA Goals:** Studies in Sardinia found that allowing urchin harvest in MPAs led to population declines, especially where natural predation was already high. Restricted harvest sites, which were highly managed and restricted, had the lowest urchin densities, suggesting cumulative pressures harm recovery.[3] Prohibiting any type of harvest – including sea urchins- has been effective in California.[4]
4) **Short term economic gains over long term ecosystem protection:** The rationale for the petition is rooted in the desire of commercial fishermen- primarily in Southern California- who want to harvest sea urchins arguing that MPAs cause economic hardship. MPAs were established to prioritize biodiversity over short-term fisheries gains, as kelp forests support hundreds of species and mitigate climate impacts.[5] The long-term benefits from protection far exceed short term loss for a handful of fishermen, MPAs are not just conservation tools—they are **investments in sustainable fisheries.**

[1] https://peerj.com/articles/12971/
[2] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/; https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2022.987242/full
[3] https://pmc.ncbi.nlm.nih.gov/articles/PMC8908888/
[4] https://pmc.ncbi.nlm.nih.gov/articles/PMC11635138/
[5] https://caseagrant.ucsd.edu/news/examining-climate-wins-marine-protected-areas

B. The Petition is Not Supported and Does Not Specify Which Species of Urchin is Included

As the petition reads, the take allowance is for ALL allowed sea urchin species and does not make the distinction of which species would be targeted to benefit kelp forests. According to CDFW, three sea urchin species have been the main species landed across the state. The red, purple, and white sea urchin are the primary species historically caught in California waters, with red urchins being the dominant species caught and sold (Table 1). From January 31, 1980, to December 31, 2024, the total purple urchin landings out of all sea urchin landings (Table 1) accounted for less than one percent of the total catch. The petitioner does not indicate if the allowance for commercial take of sea urchins would be for a specific species or all.

Species Name	Pounds	Value
Sea urchin, red	774,479,211	$429,008,941
Sea urchin, purple	2,043,647	$2,928,395
Sea urchin, white	53,647	$207,324
Total	776,576,511	$432,144,719

Table 1. Sea Urchins landed from January 31, 1980, to December 31, 2024.

It is our understanding that much of the commercial urchin fishery is focused on red urchins (Table 1), but it is the abundance of purple urchins that has contributed to the kelp decline[6] cited in the petition. Paired with the lack of a commercial market for purple urchin, sea urchins collected from barren areas are unlikely to meet the quality standards to be commercially viable. The petitioner's argument for opening the forementioned MPAs to be sustainable additions to the commercial fishery is not supported. Additionally, the petitioners did not provide any supporting data for the claim that these nine MPAs have had a significant negative impact on the urchin fishery, nor data on urchin abundance within these MPAs that could be used to do a cost-benefit analysis.

Urchin culling is one method that has had small trials along the California coast to determine effectiveness of direct removal on improving kelp forest density. It was named as a potential tool in the 2022 report "Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach."[7] However, the report also found that scaling up this process would face challenges. Specifically, the costs to go to the sites and remove the urchins would be, "most effective in areas where there is already an established commercial red urchin fishing fleet"[8] Additionally, the report indicates that reducing and **maintaining** low urchin levels is imperative to maintain kelp ecosystem recovery. The long-term socio-economic effectiveness of urchin

[6] Smith, J. G., et al. (2021). Behavioral responses across a mosaic of ecosystem states restructure a sea otter–urchin trophic cascade. *Proceedings of the National Academy of Sciences*, *118*(11), e2012493118.
[7] https://www.reefcheck.org/wp-content/uploads/2022/06/Restoration-of-Northern-Californa-bull-kelp-RCF-final-report-to-OPC.pdf
[8] Ward, M., et al. Restoration of North Coast Bull Kelp Forests: A Partnership Based Approach. Reef Check Foundation, Marina del Rey, CA, April 2022.

culling is low, as the costs to start and continue removal efforts increase the further the site is from shore and/or a red urchin port, as well as the lack of viable commercial purple urchin that live inside urchin barrens. It is difficult to say whether opening identified MPAs in this petition would benefit the commercial purple or red urchin fishery.

C. Habitat Connectivity

We utilized the data layers on the recently released tool via SeaSketch to see which habitats will lose connectivity based on the petitioners desired changes to the MPA Network. Of the listed MPAs, Point Dune SMCA, Swamis SMCA, and Point Vicente SMCA would no longer have adequate protections to maintain habitat connectivity for beach, rock, kelp, and soft substrate (0-30m) habitat. The other six MPAs do not have a high enough level of protection to count towards the habitat spacing report.

Accordingly, the petition should be rejected.

II. The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.

This petition requests opening existing no take reserves—the cornerstone of the MPA Network—to commercial fishing for pelagic species, which encompasses a wide range of species,[9] such as sharks, bill fish, tuna, and mahi mahi in Southern California. The Channel Islands State Marine Reserves (SMRs), and Federal Marine Reserves (FMRs) are among the biggest, oldest and most effective MPAs in the country. Petition 2023-15MPA does not support the goals identified during the planning process for the Channel Islands MPAs, and we therefore request that the FGC and CDFW reject the petition to reclassify three SMRs (Footprint SMR, Gull Island SMR, Santa Barbara Island SMR) in the Northern Channel Islands (NCIs) as SMCAs.

Established in 2003 after the Channel Islands National Marine Sanctuary (CINMS) Advisory Council (SAC), the Marine Reserves Working Group (MRWG) came up with goals for MPAs at the Channel Islands. The MRWG's goals stated the following:

> (1) Ecosystem Biodiversity Goal: To protect representative and unique marine habitats, ecological processes, and populations of interest; (2) Socio-Economic Goal: To maintain long-term socioeconomic viability while minimizing short-term socioeconomic losses to all users and dependent parties; (3) Sustainable Fisheries Goal: To achieve sustainable fisheries by integrating marine reserves into fisheries management; (4) Natural and Cultural Heritage Goal: To maintain areas for visitor, spiritual, and recreational opportunities which include cultural and ecological features and their associated values; and (5) Education Goal: To foster stewardship of the marine environment by providing

[9] https://www.ecfr.gov/current/title-50/chapter-VI/part-660/subpart-K

> educational opportunities to increase awareness and encourage responsible use of resources.[10]

We utilized the goals and reasonings from the "Final 2002 Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary" as the Channel Islands state and federal MPAs pre-date the Marine Life Protection Act and subsequent establishment of the statewide MPA network. Approval of this petition would be inconsistent with these goals for the following reasons.

A. MRWG Goal - **Ecosystem Biodiversity**

The establishment of the Channel Islands MPAs was, "To protect representative and unique marine habitats, ecological processes, and populations of interest," which has translated to the goals and intent of the statewide MPA Network. Past petitions requesting to establish MPAs to protect a singular species have been denied by the FGC. For example, in 2020-2021 the FGC denied a petition requesting for the creation of an MPA for White Sharks near Carpentaria reasoning, "MPAs are intended to protect ecosystems, not individual species, especially highly mobile, pelagic species."[11] The intent of California MPAs remains to protect all aspects of an ecosystem (ecosystem-wide protection), not one species. Consequently, opening an MPA for one species should also be rejected.

The petitioner makes the argument that opening Footprint SMR, Gull Island SMR, Santa Barbara Island SMR to fishing pressure would have no significant impact on non-migratory species within the MPAs. However, the increase in boat traffic through the previously closed areas would introduce noise pollution, potential derelict fishing gear, water pollution, etc. The added complexities in the individual MPAs regulations will also increase the hardship on enforcement. Additionally, the same reasons cited to open these MPAs to highly migratory species are also the reasons why we believe it is unnecessary to do so.

[10] 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).
[11] California Department of Fish and Wildlife (2022). Decadal Management Review: Appendix G Supplemental Tables.

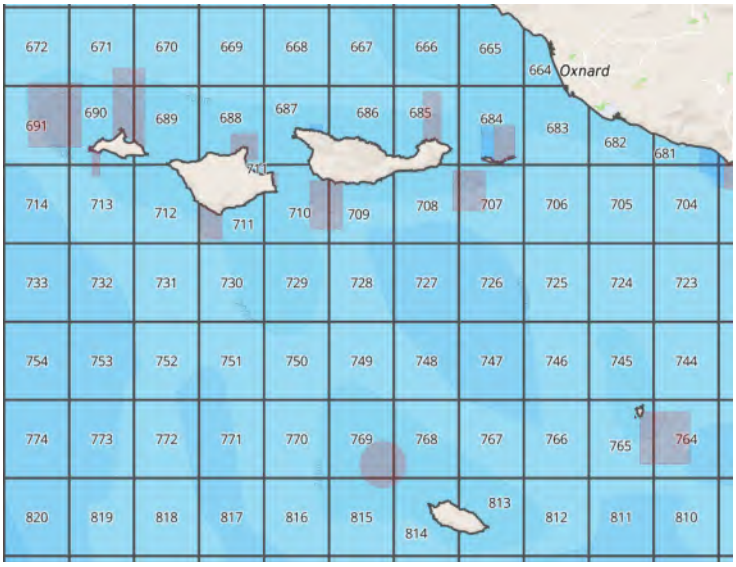


Figure 1. Seasketch Map using layers "Commercial Fishing Blocks" and "Existing Marine Protected Areas (MPAs)"

1. Reasons Why MPAs Protect Highly Migratory Species

Protecting highly migratory species (HMS) like tunas, sharks, and billfish in California waters plays a critical role in maintaining healthy marine ecosystems through trophic cascades, nutrient cycling, and habitat connectivity.

Strategically placed MPAs can protect critical habitats (e.g., spawning grounds, migration corridors) and reduce fishing pressure, such as the ones included in this petition.[12] A sharp decline of large pelagic fish (species such as sharks, swordfishes, marlins, and tuna) that roam the open sea and play vital roles as predators leads to impacts on local, regional and large-scale ecosystem dynamics. Fishing undermines MPA effectiveness which leads to target species depletion, leading to their inability to recover even within MPAs. The risk of bycatch on unintended species is high and unaccounted for, leading to ineffectiveness of the local MPA for all other components of the ecosystem.

2. Maintaining Trophic Balance (Top-Down Control)

- **Predator-prey dynamics:** HMS like bluefin tuna, mako sharks, and swordfish are apex predators that regulate mid-level species (e.g., squid, small fish). Their decline can trigger population explosions of prey species, disrupting food webs. For example, overfishing sharks in Southern California has been linked to increased cephalopod (squid/octopus) populations, which then overconsume shellfish and crustaceans.[13,14]

[12] https://www.sciencedirect.com/science/article/abs/pii/S0308597X18301866?via%3Dihub.
[13] https://www.sciencedirect.com/science/article/abs/pii/S0165783698001787
[14] https://oceanrep.geomar.de/id/eprint/53785/1/4444.pdf

- **Nutrient Cycling:** Migratory species transport nutrients across vast distances. When they feed in deep waters and excrete near the surface, they fertilize phytoplankton (the base of the marine food web), delivering valuable nutrients to MPAs. In addition, highly migratory species such as tunas and billfish contribute to the "biological carbon pump" by moving nutrients vertically, as part of benthic pelagic linkages, which enhances ocean productivity.
- **Protecting Spawning & Nursery Grounds:** Many HMS rely on offshore areas such as the MPAs for spawning and recruitment areas. The loss of protection not only may reduce recruitment success of the targeted HMS, but also loss of food sources for non-targeted species such as sea birds and rockfish. Consequently, the habitat health of these areas for non-HMS will be degraded.
- **Reducing Bycatch & Ecosystem Damage:** HMS fisheries (e.g., longlines, drift gillnets) often catch non-target species, including threatened and endangered species (leatherback turtles, short-tailed albatross). Furthermore, bycatch often includes species that are key ecosystem engineers (e.g., giant sea bass, which maintain kelp forest health).

Protecting HMS isn't just about saving iconic species—it's about **preserving the ocean's "circulatory system."** Their migrations connect distant ecosystems, making them indispensable to California's marine biodiversity.

B. MRWG Goals - **Socio-Economic & Sustainable Fisheries**

Under the socio-economic and sustainable fisheries goals established by the MRWG, the petitioners request to reclassify select MPAs to alleviate negative impacts on the fisheries for listed highly migratory species[15] would undo the achievements the MPAs have reached. The long-term benefits of maintaining the current level of protection have proven to outweigh the short-term socioeconomic losses that came with establishing the MPAs. For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species within the CINMS blocks[16] used in Figure 2. [17] Pre-MPAs (1998-2002), the total value landed

[15] List of State HMS, CPS, and Pelagic finfish per Title 14 CA § 1.49, 1.39, and 632(3): -Highly migratory species means any of the following: albacore, bluefin, bigeye, and yellowfin tuna (Thunnus spp.); skipjack tuna (Katsuwonus pelamis); dorado (dolphinfish) (Coryphaena hippurus); striped marlin (Tetrapturus audax); thresher sharks (common, pelagic, and bigeye) (Alopias spp); shortfin mako shark (Isurus oxyrinchus); blue shark (Prionace glauca); and Pacific swordfish (Xiphias gladius). -Coastal pelagic species means any of the following: northern anchovy (Engraulis mordax), Pacific sardine (Sardinops sagax), Pacific mackerel (Scomber japonicus), jack mackerel (Trachurus symmetricus), and market squid (Loligo opalescens). -Pelagic finfish, are a subset of finfish defined as: northern anchovy (Engraulis mordax), barracudas (Sphyraena spp.), billfishes (family Istiophoridae), dolphinfish (Coryphaena hippurus), Pacific herring (Clupea pallasi), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), salmon (Oncorhynchus spp.), Pacific sardine (Sardinops sagax), blue shark (Prionace glauca), salmon shark (Lamna ditropis), shortfin mako shark (Isurus oxyrinchus), thresher sharks (Alopias spp.), swordfish (Xiphias gladius), tunas (family Scombridae) including Pacific bonito (Sarda chiliensis), and yellowtail (Seriola lalandi).

[16] See Figure 1 for reference to the fishing blocks used in the analysis.

for the MPA fishing blocks within the CINMS was 2.899% and the total pounds landed was 4.030%. Post-MPAs (2020-2024), the total value landed for the MPA fishing blocks within the CINMS was 28.980% and the total pounds landed was 45.962%. By pounds and by value, there has been an increase in economic success that followed the establishment of the CINMS MPAs, indicating that opening the MPAs will not necessarily increase the benefit to the HMS fisheries. The return of many species, not just tuna and sharks, cannot be proven to have benefited solely from the establishment of the MPAs. However, the increase in population was and is likely amplified and supported by the MPA network.

[17] Displays percentage values calculated by dividing the MPA petition fishing blocks by the CINMS fishing blocks. This was done to assess the economic impacts locally versus comparing the MPA petition fishing blocks to the entire state.

Block ID	Total Pounds	Total Value
707	$869	$4,537
708	$4,480	$15,767
709	$3,624	$16,934
710	$4,813	$6,555
764	$543	$2,632
765	$2,598	$14,079
683	$16,619	$23,693
684	$1,814	$3,364
685	$2,809	$6,680
686	$1,312	$3,564
687	$1,476	$3,454
688	$7,233	$9,766
689	$2,175	$4,742
690	$2,224	$3,346
691	$518	$943
706		Confidential
711	$2,889	$6,868
712	$1,816	$3,518
713	$0	$0
744	$598	$1,199
745		Confidential
Total Petition 2023-15*	$16,927	$60,505
Total CINMS**	$58,409	$131,642
Total All Blocks	**$8,849,117**	**$13,908,685**
Petition/All	0.191%	0.435%
CINMS/All	0.660%	0.946%
Petition/CINMS***	28.980%	45.962%

Table 2.[18] Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 2020- Dec 31, 2024.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

[18] Note “confidential” is data withheld by CDFW.

Block ID	Total Pounds	Total Value
707	$1008	$1279.25
708	$2395.9	$2626.375
709		Confidential
710	$4116.6	$3863.85
764		Confidential
765		Confidential
683	$137,641	$54,943
684	$5,202	$5,709
685	$13,302	$12,537
686	$6,648	$8,923
687	$7,983	$8,005
688	$47,129	$56,320
689	$5,949	$5,380
690	$6,978	$10,696
691	$0	$0
711	$14,381	$17,448
712	$2,009	$1,149
713	$4,705	$3,895
744	$0	$0
745		Confidential
Total Petition 2023-15*	$7520.5	$7769.475
Total CINMS**	$259446.93	$192775.2925
Total All Blocks	**32,150,483**	**$22,954,516**
Petition/All	0.0234%	0.0338%
CINMS/All	0.807%	0.840%
Petition/CINMS***	2.899%	4.030%

Table 3. Data from CA Department of Fish and Wildlife. Marine Fisheries Data Explorer. Species analyzed are sharks and tuna. Species analyzed are sharks and tuna that were landed from Jan 1, 1998- Dec 31, 2002.
* Blocks surrounding the MPAs listed in petition 2023-15MPA. Inside the box.
** Blocks surrounding San Miguel Island, Santa Rosa Island, Santa Cruz Island, Anacapa Island, and Santa Barbara Island (683, 684, 685, 686, 687, 688, 689, 690, 691, 706 ,707, 708, 709, 710, 711, 712, 713, 744, 745, 764, 765).
*** MPA petition fishing blocks divided by CINMS fishing blocks.

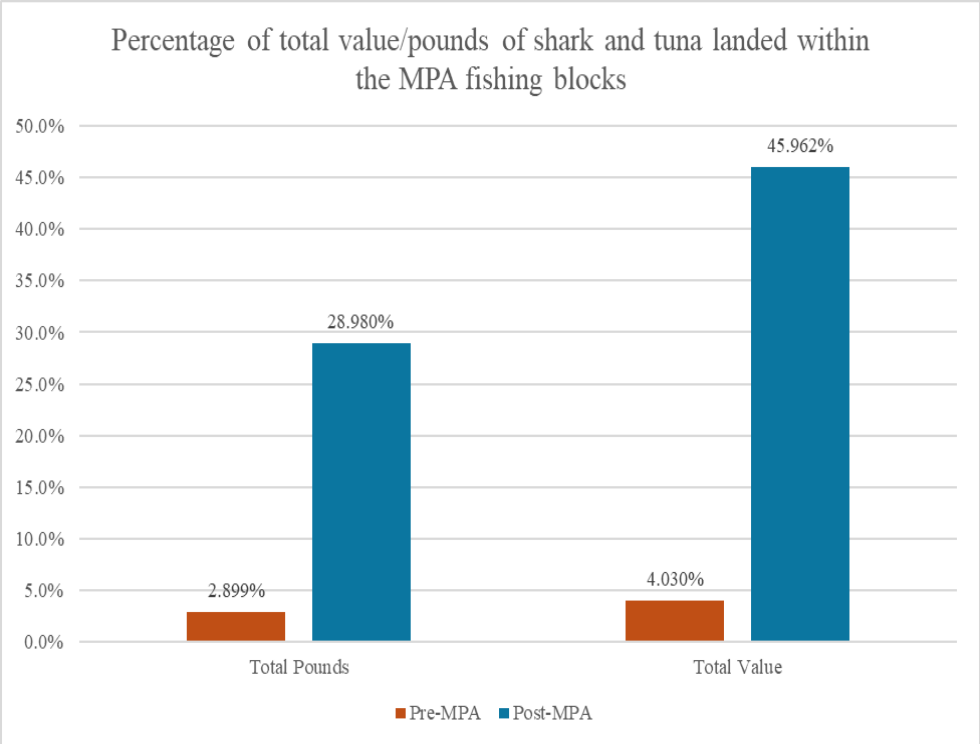


Figure 2. Comparison of Pre-MPA (Jan 1st, 1998- Dec 31st, 2002) and Post-MPA (Jan 1st, 2020- Dec 31st, 2024) total value and total weight by pounds of shark and tuna species landed within the MPA blocks compared to the CINMS fishing blocks.

C. MRWG Goals - **Natural and Cultural Heritage & Education**

An integral component of the CINMS MPAs and the statewide MPA Network is the inclusion of humans. The areas are not only to help conservation and enhance fisheries management, but to provide areas for spiritual, educational, and recreational opportunities.[19] A 2024 survey[20] revealed that 81% of Californians favor expanding MPAs to protect fish, wildlife, and their habitat off the state's coast. Protecting California waters is not only important for the species living in those environments, but also for California ocean users which include non-consumptive uses like beach going, whale watching, photography, surfing, scuba diving, and boating. The Natural and Cultural Heritage Goal and Education goals are intended to maintain areas in the marine environment that give an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically. The petitioners request to open three highly protected MPAs does not support these goals.

III. CONCLUSION

[19] 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).
[20] https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2024/

As California's ocean faces a growing suite of threats from climate change and other human uses, we urge the Commission and CDFW to use its authority to strengthen the MPA network to ensure adequate representation of all key habitats in MPAs so that California's MPA network remains an effective ecosystem-based approach for resilience into the future. To help ensure the network's health rejecting both petition 2023-14 MPA and petition 2023-15 MPA is necessary. Once again, we would like to thank both FGC and CDFW for their dedication to the adaptive management process of California's MPA network.

Sincerely,

October 3, 2025

Erika Zavaleta, President
California Fish and Game Commission
California Natural Resources Headquarters Building
715 P Street, 2nd Floor
Sacramento, CA 95814

Re: **Clarification to Letter 'Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023- 15MPA' and rebuttal from Petitioner re Petition 2023- 15MPA**

Dear President Zavaleta and Honorable Commissioners:

The following information is submitted to clarify the framing and content of the letter of support submitted by the Environmental Defense Center (EDC) on July 31, 2025, titled 'Agenda Item 17 C re Comments on MPA Petitions 2023-14MPA and 2023- 15MPA' (July letter). This letter is submitted because the petitioner of petition 2023-15MPA submitted a letter to the Fish and Game Commission in late September 2025, concerning EDC's data collection and other issues. Specifically, the clarifications included in this letter concern Section 2 of the July letter,

titled 'The FGC and CDFW Should Reject PETITION 2023-15MPA - Opening Channel Islands MPAs to Allow Take of Highly Migratory Species.'

As explained below, EDC appropriately collected data from the agency's Marine Fisheries Data Explorer in conducting our evaluation of petition 2023-15MPA. In addition, EDC did not single out gear types in our analysis of whether MPAs benefit fisheries.

I. The FGC Marine Fisheries Data Explorer Breakdown

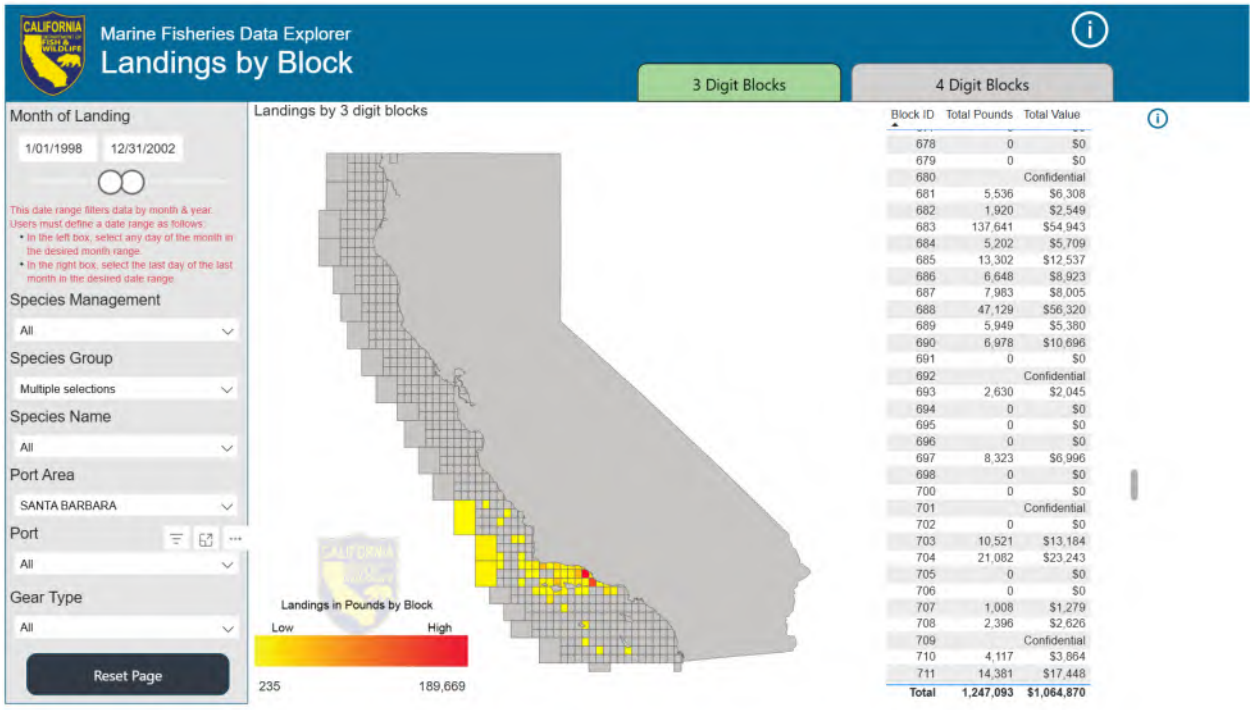
A. Framing of EDC's Analysis

The goal of the analysis conducted for the July letter was to determine if the establishment of Marine Protected Areas (MPAs) in California had tangible improvements to fish landings. We set the time frames for pre and post MPA establishment to reflect this intent, utilizing the shark and tuna species filter as an example, as stated on page 7 under section B, "For example, the establishment of the MPAs at the NCIs has seen an increase in landings of shark and tuna species within the CINMS blocks...". The analysis was not specifically targeted at pelagic vs non-pelagic species, rather we investigated whether there is a benefit to MPAs that has impacted the amount of catch in the area.

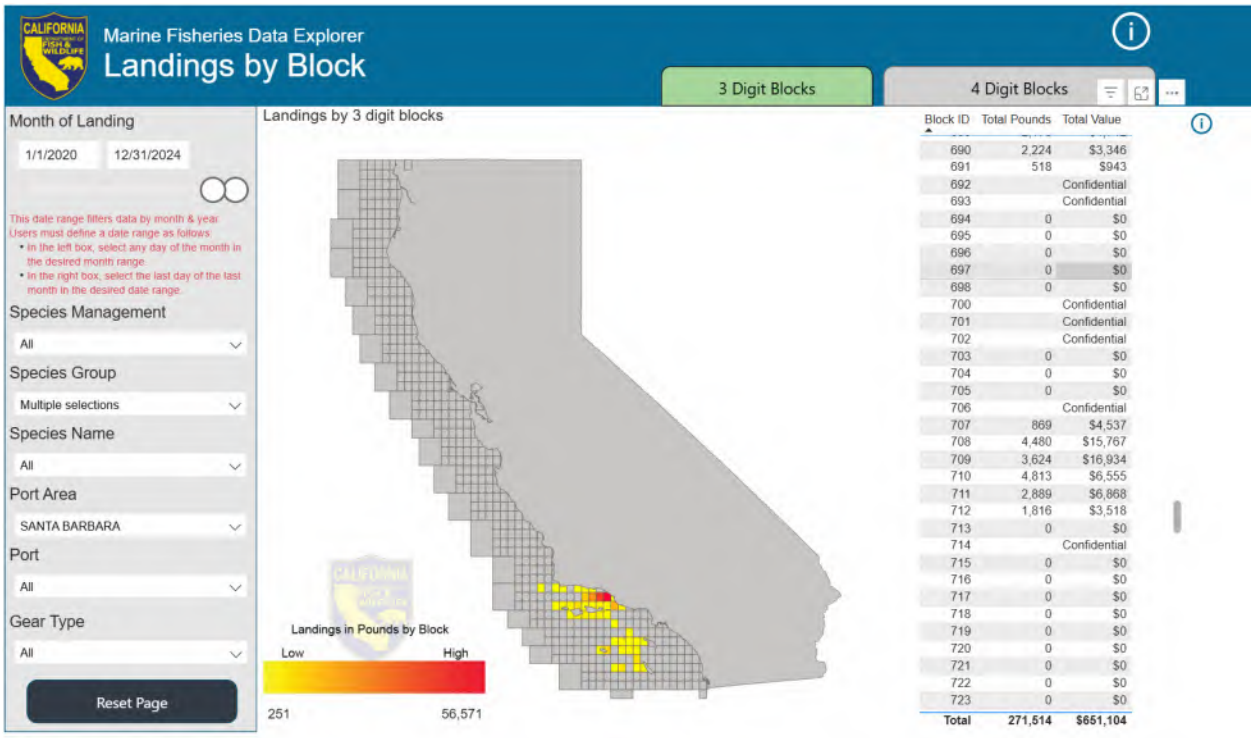
B. EDC Process for Data Collection

The following steps describe EDC's approach to data collection underlying the letter.

1. Access the Marine Fisheries Data Explorer: https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE
2. Under "Visualize"(the first box on the left), select "Landings by Block" (second link)
3. Change the parameters to fit the target time frame, location, and species
    a. Species management – N/A
    b. Species Group – Shark and tuna
    c. Species Name – N/A
    d. Port Area – Santa Barbara
    e. Port – N/A
    f. Gear Type – N/A
4. Data explored will produce a table on the right hand side (refer to below screenshots captured on October 1, 2025)



Screenshot of data from CA Department of Fish and Wildlife: Marine Fisheries Data Explorer. For the timeframe of Jan 1, 1998- Dec 31, 2002, species selected are sharks and tuna.



Screenshot of data from CA Department of Fish and Wildlife: Marine Fisheries Data Explorer. For the timeframe of Jan 1, 2020- Dec 31, 2024, species selected are sharks and tuna.

C. Comparison of Data Collected for the July Letter

The following tables were populated by data directly downloaded from the Marine Fisheries Data Explorer for the July letter and this letter (pulled on October 1, 2025). The petitioner states that the data is "allegedly confidential," leading to results that are swayed to fit our specific narrative. The petitioner does not supply any data from the Marine Fisheries Data Explorer to showcase the discrepancy in data. Additionally, it is listed on the Marine Fisheries Data Explorer User Guide: Confidential Data[1] that:

> Pursuant to California Fish and Game Code Section 8022, commercial landings data is considered confidential. Landings data in the MFDE, is therefore summarized and presented so as not to disclose data from an individual or business. Landings data marked as "Confidential" in the MFDE indicates there was insufficient data to summarize and maintain confidentiality.

On October 1, 2025, we again pulled the below data from the Marine Fisheries Data Explorer to determine if there were any changes to the data after submission of the July letter. As apparent in the tables below, there has been no change to the data from July to October, and therefore no change to the analysis EDC conducted.

[1] https://wildlife.ca.gov/Conservation/Marine/Data-Management-Research/MFDE/User-Guide

Please see the table comparing values for 1998-2002 below.[2]

	July letter submission data		**October 1, 2025 data collection**	
Block ID	**Total Pounds**	**Total Value**	**Total Pounds**	**Total Value**
707	1008	$1,279.25	1,008	$1,279
708	2395.9	$2,626.38	2,396	$2,626
709		Confidential		Confidential
710	4116.6	$3,863.85	4,117	$3,864
764		Confidential		Confidential
765		Confidential		Confidential
683	137641	$54,943	137,641	$54,943
684	5202	$5,709	5,202	$5,709
685	13302	$12,537	13,302	$12,537
686	6648	$8,923	6,648	$8,923
687	7983	$8,005	7,983	$8,005
688	47129	$56,320	47,129	$56,320
689	5949	$5,380	5,949	$5,380
690	6978	$10,696	6,978	$10,696
691	0	$0	0	$0
711	14381	$17,448	14,381	$17,448
712	2009	$1,149	2,009	$1,149
713	4705	$3,895	4,705	$3,895
744	0	$0	0	$0
745		Confidential		Confidential
*Total Petition 2023-15**	7520.5	$7,769.48		
*Total CINMS***	259446.93	$192,775.29		
Total All Blocks	**32,150,483**	**$22,954,516**		
Petition/All	0.02%	0.03%		
CINMS/All	0.81%	0.84%		
*Petition/CINMS****	2.90%	4.03%		

[2] Please note that the values under "Total pounds" on the July letter were labeled as a currency which is incorrect, however that does not change the results.

Please see the table comparing values for 2020-2024 below.[3]

2020- 2024 Table

	July letter submission data		**October data collection**	
Block ID	**Total Pounds**	**Total Value**	**Total Pounds**	**Total Value**
707	869	$4,537	869	$4,537
708	4480	$15,767	4,480	$15,767
709	3624	$16,934	3,624	$16,934
710	4813	$6,555	4,813	$6,555
764	543	$2,632	543	$2,632
765	2598	$14,079	2,598	$14,079
683	16619	$23,693	16,619	$23,693
684	1814	$3,364	1,814	$3,364
685	2809	$6,680	2,809	$6,680
686	1312	$3,564	1,312	$3,564
687	1476	$3,454	1,476	$3,454
688	7233	$9,766	7,233	$9,766
689	2175	$4,742	2,175	$4,742
690	2224	$3,346	2,224	$3,346
691	518	$943	518	$943
706		Confidential		Confidential
711	2889	$6,868	2,889	$6,868
712	1816	$3,518	1,816	$3,518
713	0	$0	0	$0
744	598	$1,199	598	$1,199
745		Confidential		Confidential
*Total Petition 2023-15**	16927	$60,505		
*Total CINMS***	58409	$131,642		
Total All Blocks	8849117	**$13,908,685**		
Petition/All	0.19%	0.44%		
CINMS/All	0.66%	0.95%		
*Petition/CINMS****	28.98%	45.96%		

[3] Please note that the values under "Total pounds" on the July letter were labeled as a currency which is incorrect, however that does not change the results.

II. Gear Type Request of the Petitioner

The petitioner also claims that we misconstrued the gear type allowance listed in petition 2023-15MPA. In the July letter the only reference to longlines and drift gillnets was as an example of bycatch offenders found on page 7, section 2.A.2. Nowhere else in section 2 (addressing petition 2023-15MPA) did we list a gear type; instead, the arguments made in the letter center around our opposition to the weakening of these MPAs, which for twenty years have been allowed to heal without extractive practices.

III. Conclusion

Accordingly, we respectfully request that the Commission consider the points previously articulated in EDC's letters, which are appropriately supported by relevant data. Please do not hesitate to let us know if you have any questions or would like additional information.

Sincerely,

Azsha Hudson
Marine Conservation Analyst & Program Manager
Environmental Defense Center

Ashley Eagle-Gibbs, Esq.
Executive Director
Environmental Action Committee of West Marin

Ray Hiemstra
Associate Director of Policy and Projects
Orange County Coastkeeper

Katie O'Donnell
US Ocean Conservation Manager
WILDCOAST

Tomas Valadez
California Policy Manager
Azul

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
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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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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.

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

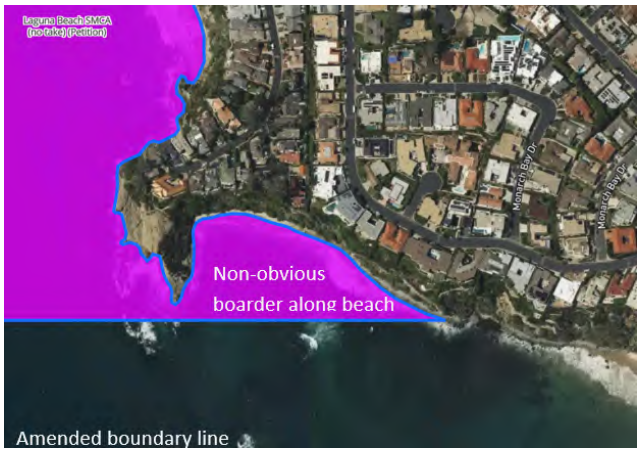
Petition 23 requests multiple changes to 3 existing SMCAs, the Carmel Bay SMCA, Pacific Grove SMCA, and the Edward F. Ricketts SMCA, requesting all three SMCAs become closed to take of finfish during “active kelp restoration permits” and to create a new SMR at Tankers Reef, the area of this SMR was reduced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

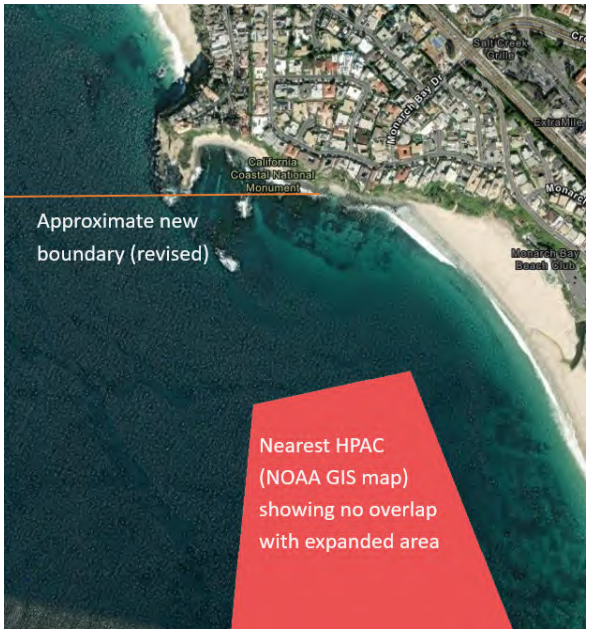
If the petitioner wishes to accomplish the outstanding goals of this petition, then a similar approach to that in Petition2023-14MPA should be considered. Such an approach could consist of keeping the 3 SMCAs as SMCAs with the same allowable take regulations, but only adding a new allowance for the recreational 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).

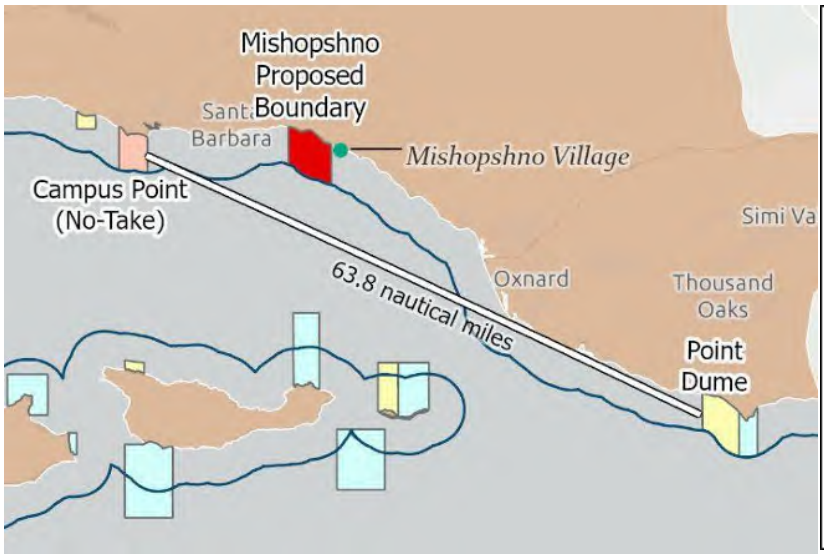


Image 1: Petition 29's image displaying proposed area and <u>claimed</u> spacing between existing Pt. Dume and Campus Point SMAs to be 63.8 nm (73.4 mi), which, if true, would exceed the southern MLPA MPA spacing requirements.

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).

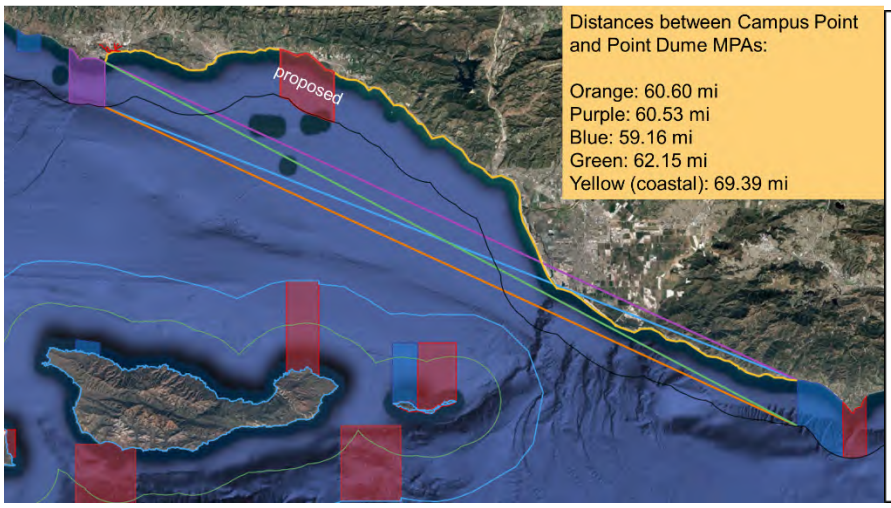


Image 2: Actual spacings between nearest existing MPAs around the proposed site. All but one straight line measurement exceeds 62 miles. The length that would be used by CDFW according to their provided input would be 60.60 mi (orange line) which falls within the spacing requirement.

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.

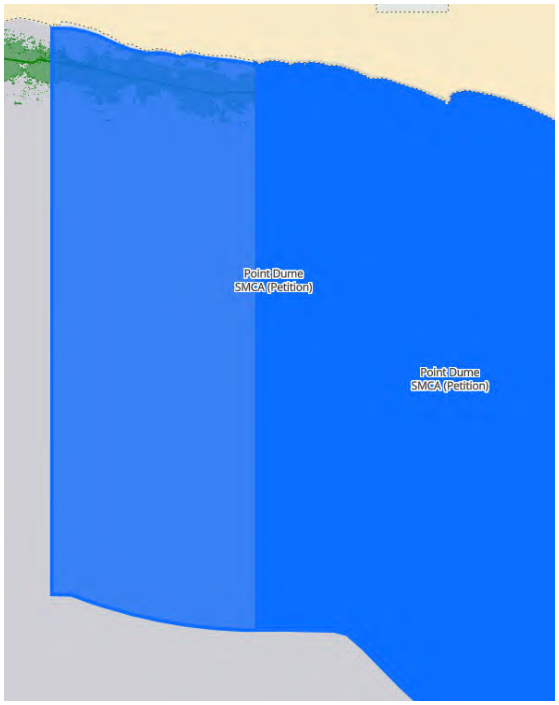
Regarding the original MPA expansion proposals, and even specifically the southern expansion (image above), the new covered area has a very asymmetric shape. This goes directly against MLPA guidelines for designating MPAs which state that MPAs with odd-asymmetric shapes are difficult to enforce and confusing 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.

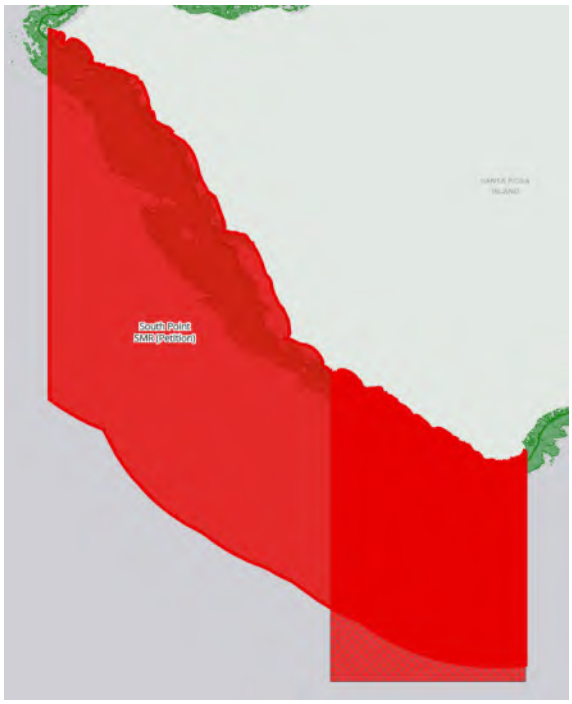
<u>Petition2023-33MPA – Reject</u>

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

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

Petition 2023-15MPA-AM2

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

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

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

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

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

March 31, 2026

RE: Support for DFW Recommendation to Deny Petitions 2023-15MPA-AM and 2023-16MPA

Dear Commissioners,

I am writing in support of the California Department of Fish and Wildlife recommendation to deny MPA petitions 2023-15MPA-AM and 2023-16MPA.

These petitions would severely weaken protections within existing, fully protected State Marine Reserves (SMRs) by converting them into take-allowed State Marine Conservation Areas (SMCAs). SMRs are the cornerstone of our conservation efforts; diminishing their no-take status would compromise the backbone of California's MPA Network and set a perilous precedent for future petitions that serve commercial and recreational fishing interests.

As I have noted in previous correspondence, these petitions are fundamentally flawed for several key reasons:

- **Inconsistent with Guiding Principles:** The proposed conversions directly contradict the MPA Petition Guiding Principles established during the July 2023 Marine Resources Committee (MRC) meeting. Those principles clearly dictate that successful MPA petitions must "maintain or enhance the protections and integrity of the MPA Network." Petitions 2023-15MPA-AM and 2023-16MPA fail to meet this standard, as they strictly reduce existing protections.
- **Failure to Advance DMR Recommendations:** These petitions do not advance any of the scientific or adaptive management recommendations outlined in the Decadal Management Review.
- **Hinders 30x30 Progress:** Reducing protections in foundational SMRs runs counter to California's Pathways to 30x30.[1] To reach state goals, California must strengthen and expand marine protections, not weaken protections that are already in place.
- **Complicates Enforcement:** Allowing pelagic or other take in current no-take zones would significantly compromise MPA enforcement. Shore-based observers, allied agencies, ordinary citizens, and technologies like Marine Monitor will struggle to distinguish vessels fishing for newly permitted species from those illegally targeting prohibited species. This uncertainty will inevitably lead to fewer reports of potential violations and a reduction in overall enforcement effectiveness.

I strongly urge the Fish and Game Commission to uphold the Department's recommendation and deny Petitions 2023-15MPA-AM and 2023-16MPA. Thank you for your time, consideration, and continued commitment to safeguarding California's coastal waters.

Sincerely,

Eric Praske
Laguna Beach, CA

[1] Pathways to 30x30 Cailfornia Accelerating Conservation of California's Nature

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

Marine Conservation Institute
14301 Arnold Dr. Suite 25 • Glen Ellen, CA 95442 USA
www.marine-conservation.org

Outlook

April 2026 FGC Meeting Agenda Item 2: MPA Petitions Public Comment Letter

From Katie O'Donnell <katie@wildcoast.org>
Date Thu 04/02/2026 04:14 PM
To FGC <FGC@fgc.ca.gov>; fgcericsklar[redacted]; Samantha Murray [redacted] commissionerdariusanderson [redacted] commissioner.zavaleta [redacted]; jhostler [redacted]
Cc Shuman, Craig [redacted]; Waggoner, Claire [redacted]; Worden, Sara [redacted]; Eckerle, Jenn@CNRA <Jenn.Eckerle@resources.ca.gov>; Lewis, Staci@CNRA <Staci.Lewis@resources.ca.gov>; Esgro, Michael@CNRA <Michael.Esgro@resources.ca.gov>; Ashcraft, Susan [redacted] Miller-Henson, Melissa [redacted]

Good afternoon,

Please see the attached letter for **Agenda Item 2: MPA Petitions** for the upcoming April 15-16 FGC meeting.

Signed by 31 organizations and 2 individuals, the letter respectfully asks the FGC Commission to support CDFW's recommendation to reject petitions 2023-14, 2023-15, 2023-16, and 2023-18 (except for supporting 2023-18MPA_2: Marine Monitor radar at Point Conception).

This letter summarizes how these petitions would weaken the MPA network's integrity, fail to adhere to science-based guidelines and Marine Life Protection Act goals, and conflict with the Decadal Management Review. The letter notes that in total, the four petitions would reduce protections across 18 MPAs within California's MPA Network.

Thank you for your leadership and for considering these comments.

Please let me know if you have any questions!

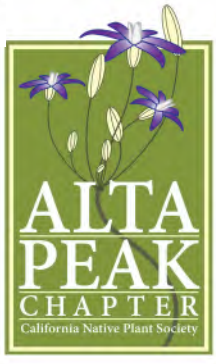
Thank you,
Katie

--

WILDCOAST COSTASALVAJE

Katie O'Donnell
Senior Ocean Conservation Manager
she/her/hers

DONATE TODAY!



Friends of Rose Creek
"Connecting Our Communities"

April 2, 2026

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

Submitted electronically to fgc@fgc.ca.gov

RE: **Agenda Item 2** - Opposition to Petitions 2023-14, 2023-15, 2023-16, and 2023-18 which would weaken the California MPA Network

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

The undersigned organizations -representing public interest, marine science, environmental conservation, and coastal communities - strongly oppose Petitions 2023-14, 2023-15, 2023-16, and 2023-18 and agree with California's Department of Fish and Wildlife (CDFW)'s recommendations to deny them. These proposals would significantly weaken California's Marine Protected Area (MPA) Network and undermine the ecological integrity that the Marine Life Protection Act (MLPA) was created to protect. In total, the petitions would reduce protections across eighteen MPAs, including six State Marine Reserves (SMRs), two no-take State Marine Conservation Areas (SMCAs), eight SMCAs, and two Special Closure Areas.

We urge the Fish and Game Commission (FGC) to deny petitions that fail to meet the Decadal Management Review (DMR)'s definition of adaptive management: "Guided by the principles of adaptive management, [the first ten-year management review] is an opportunity to evaluate progress to date, celebrate accomplishments, provide lessons learned, and identify recommendations to strengthen the MPA Network and Management Program going forward."[1]

We oppose these petitions because they:

- **Weaken MPA Network Integrity**
  California's MPA network was intentionally designed using science-based guidelines developed by CDFW and expert scientists to ensure larval connectivity, habitat representation, trophic structure, and ecosystem resilience. Because the network functions as an interconnected system, weakening individual MPAs compromises the entire network and conflicts with the goals of the MLPA. The International Union for Conservation of Nature (IUCN) recognized the network's effectiveness by adding it to the Green List of Protected and Conserved Areas after a seven-year evaluation. Rolling back protections or increasing extractive activities threatens the network's ability to sustain biodiversity and ecological connectivity.

[1]California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022, nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=209209.

- **Fail to Adhere to Science-Based Guidelines and MLPA Goals**
  The MLPA requires that any modifications to MPAs support its six statutory goals and align with established scientific guidelines[2]. The petitions fail to meet these standards. The network's design was grounded in peer-reviewed research on fish movement, larval dispersal, and population persistence, including spatial population models demonstrating that minimum size and spacing criteria are essential for ecological connectivity. Reducing protections in ways that violate these criteria lacks scientific justification and risks degrading network performance.

  Scientific literature is also clear that adaptive management is intended to strengthen MPAs based on monitoring data, not weaken them[3]. As California enters a critical phase of long-term monitoring and adaptive management, peer-reviewed guidance emphasizes that adaptability means refining protections using new evidence, not making ad hoc reductions. A 2023 global synthesis of 307 MPA design recommendations across 56 publications established "permanence and adaptability" as foundational principles, defining the latter specifically as evidence-based enhancement rather than diminished protection[4].

- **Do Not Align with the Decadal Management Review (DMR)**
  The state has invested heavily in monitoring and data synthesis, including more than $60 million from the Ocean Protection Council since 2017. Findings from the DMR highlight the need to maintain and enhance resilience in the face of climate change, which is a goal fundamentally incompatible with weakening existing protections.

Deny Petition 2023-14MPA: Opening Sea Urchin Harvest to Commercial Fishing Within Existing MPAs

The undersigned organizations urge the FGC to reject Petition 2023-14MPA. The proposed changes fail to address the underlying drivers of kelp decline, contradicts the core mandates of the MLPA, and would weaken the integrity of the broader MPA network. We support CDFW's recommendation to deny the petition, including its conclusion that the proposal conflicts with the original objectives of the affected MPAs and does not align with adaptive management guidance from the DMR.

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[2]California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=

[3] Van Diggelen, Amanda D., et al. "California's Lessons Learned and Recommendations for Effective Marine Protected Area Network Management." *Marine Policy*, vol. 137, Mar. 2022, p. 104928, https://doi.org/10.1016/j.marpol.2021.104928. 7 January 2022.

[4] Burns, E. S., et al. "Finding harmony in Marine Protected Area design guidelines." *Conservation Science and Practice*. Vol. 5, Issue 6. https://doi.org/10.1111/csp2.12946. 24 April 2023.

The Proposed Action Would Not Address Kelp Loss

The petition seeks to open nine SMCAs to commercial urchin harvest to support kelp restoration. However, purple urchins - the species responsible for kelp barrens - represent only 0.26% of commercial landings and have almost no market value. Red urchins make up 99.73% of landings but are not driving kelp decline[5]. Opening MPAs would therefore incentivize removal of red urchins, not the ecologically harmful purple urchins, and would not meaningfully reduce urchin pressure on kelp forests. Current research instead supports targeted, science-based purple urchin removals using trained divers to minimize ecosystem impacts[6], [7].

The Petition Conflicts With MLPA Goals

The proposal undermines four MLPA goals (1, 2, 5, and 6) by exposing protected species to increased risk, weakening trophic dynamics, and creating enforcement challenges[8]. Allowing commercial take within MPAs increases confusion and accidental take, contradicting the MLPA's requirement for clear, enforceable protections[9]. Multiple gear types can be used to take urchins[10], and vessels can carry or switch gear, making it difficult for wardens to verify compliance within SMCAs[11]. Increasing allowable take in MPAs with already complex rules runs counter to MLPA Goal 5 and to the DMR's emphasis on improving,not weakening, management effectiveness.

In Southern California MPAs, intact trophic cascades have been shown to support kelp resilience during marine heatwaves[12],[13]. In these systems, predators such as lobsters and sheephead naturally regulate urchin populations [14],[15]. Opening these MPAs to commercial urchin harvest would erode these predator-prey relationships.

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[5] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[6] Bennet and Caton,2019. Marine heat wave and multiple stressors tip bull kelp forest to sea urchin barrens.https://www.nature.com/articles/s41598-019-51114-y
[7] Eisaguirre et al. 2020. Trophic redundancy and predator size class structure drive differences in kelp forest ecosystem dynamics.
[8] California Legislature. California Fish and Game Code, div. 3, ch. 10.5, Marine Life Protection Act, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=10.5.&article=
[9] Turnbull et. al. "Evaluating the social and ecological effectiveness of partially protected marine areas." *Conservation Biology*, Vol. 35, Issue 3. https://doi.org/10.1111/cobi.13677. 14 January 2021.
[10] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 25 Mar. 2026.
[11] 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.
[12] Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[13] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.
[14]Kumagai et al. 2024. Marine Protected Areas that preserve trophic cascades that promote resilience of kelp forests to heat waves.
[15] Hamilton and Caselle 2015. Exploitation and recovery of a sea urchin predator has implications for the resilience of southern California kelp forests.

On the North Coast, where sheephead and otters are absent, commercial harvest would still primarily remove red urchins rather than the purple urchins driving kelp loss[16],[17]. Scientific Collecting Permits offer a more appropriate tool for targeted purple urchin removal while maintaining network protections and supporting long-term commercial viability of red urchins.

The Petition Would Weaken the MPA Network

SeaSketch analysis shows the petition would reduce habitat connectivity and significantly downgrade the level of protection (LOP) in several MPAs. Point Dume, Swami's, and Point Vicente (currently functioning as a no-take SMR) would fall to "moderate-low" protection levels, undermining spacing and habitat representation guidelines essential to network design[18],[19],[20]. These changes would diminish long-term ecological benefits without evidence that commercial urchin harvest would improve kelp health.

Deny Petition 2023-15MPA: Opening Channel Island MPAs to Allow Take of Highly Migratory Species

The undersigned organizations urge the FGC to reject Petition 2023-15MPA because it conflicts with the goals of the Marine Reserves Working Group (MRWG) that supported the Channel Islands MPA designation process in 2003[21], as well as the goals of the MLPA. The petition also undermines ecosystem protections for highly migratory species (HMS), and creates enforcement challenges. We support CDFW's recommendation to deny the petition.

The proposal would open three no-take SMRs in the Channel Islands (Footprint, Gull Island, and Santa Barbara Island) to commercial fishing for pelagic and HMS species. These Channel Islands MPAs are among the largest, oldest, and most effective in the nation and serve as the "crown jewels" of California's MPA network. Reclassifying them as SMCAs contradicts the original planning goals for the region and the statewide MLPA framework.

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[16] Marine Mammal Commission. "Southern Sea Otter - Marine Mammal Commission." Marine Mammal Commission, Marine Mammal Commission, 2015, www.mmc.gov/priority-topics/species-of-concern/southern-sea-otter/. Accessed 25 Mar. 2026.
[17] California Department of Fish and Wildlife. Marine Fisheries Data Explorer; Landings by Value and Participation. https://mfde.wildlife.ca.gov/visualize/LandingsSummary. Accessed 27 Feb. 2026.
[18]SeaSketch California. 14_7 Point Dune SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/524. Accessed 27 Feb. 2026.
[19] SeaSketch California. 14_9 Swami's SMCA (Take) Discussion Forum. https://www.seasketch.org/california/app/forums/280/526. Accessed 27 Feb. 2026.
[20] SeaSketch California. 14_8 Point Vicente SMCA (no-take) (Take/Designation) Discussion Forum. https://www.seasketch.org/california/app/forums/280/525. Accessed 27 Feb. 2026.
[21] History of the Community-Based Process on Marine Reserves at the Channel Islands National Marine Sanctuary 1999-2001. March 2002. https://nmschannelislands.blob.core.windows.net/channelislands-prod/media/docs/2001-marine-reserves-sac-history.pdf Accessed 25 Mar. 2026.

Inconsistent With MRWG and MLPA Goals

The Channel Islands MPAs were established to protect representative habitats, ecological processes, and ecosystem-level biodiversity, not individual species. The MRWG explicitly designed these reserves to safeguard whole ecosystems, a principle reinforced by past FGC decisions rejecting petitions focused on single species (e.g., the 2020–21 white shark MPA proposal)[22]. Opening MPAs to target HMS contradicts this ecosystem-based mandate.

The petition also conflicts with MLPA Goals 1 and 2, which require protecting marine life abundance and ecosystem integrity. Contrary to the petitioner's claims, HMS are not merely transient visitors, they are apex predators that provide critical top-down structural influence on the marine community. Although wide-ranging, they aggregate at predictable hotspots such as seamounts and fronts, and studies show increases in tuna size and reduced fishing pressure following MPA establishment[23],[24]. By foraging on resident MPA species, HMS gain access to high quality prey without the risk of capture from fishing. Allowing HMS take would remove these benefits and introduce new disturbances such as boat traffic, noise, pollution, and derelict gear that harm non-migratory species the MPAs were designed to protect.

Ecological Importance of Protecting HMS and Pelagics

HMS and pelagic species provide essential ecosystem services[25]. They transport nutrients across ocean regions and act as apex predators that regulate mid-trophic species[26],[27]. Removing them can trigger destabilizing food-web shifts, such as mesopredator booms. In Southern California, declines in sharks and billfish have been linked to increases in Humboldt squid, which then prey heavily on hake, herring, and crustaceans[28]. Allowing HMS fishing in MPAs risks amplifying these cascading effects. Generally, HMS fisheries also frequently catch non-target species, including threatened turtles and seabirds, although hook-and-line, spear, harpoon, and deep set buoy gear is highly selective and generally avoids surface-dwelling species. Introducing take into no-take MPAs would expose protected habitats and species to new risks, undermining the core purpose of the reserves.

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[22] California Department of Fish and Wildlife. California's Marine Protected Area Network Decadal Management Review. 2022. Appendix G Supplemental Tables.
[23] McDonald, Gavin, et al. "Global Expansion of Marine Protected Areas and the Redistribution of Fishing Effort." *Proceedings of the National Academy of Sciences*, vol. 121, no. 29, 9 July 2024, https://doi.org/10.1073/pnas.2400592121.
[24] Curnick, David J, et al. "Interactions between a Large Marine Protected Area, Pelagic Tuna and Associated Fisheries." Vol. 7, 14 May 2020, https://doi.org/10.3389/fmars.2020.00318
[25] Heithas et al. 2008. Predicting ecological consequences of marine top predator declines.
[26]Bauer, S., and B. J. Hoye. "Migratory Animals Couple Biodiversity and Ecosystem Functioning Worldwide." *Science*, vol. 344, no. 6179, 4 Apr. 2014, https://doi.org/10.1126/science.1242552
[27] Reynolds, Heather L, and Keith Clay. "Migratory species and ecological processes." *Environmental Law*, vol. 41, no. 2, 2011, pp. 371–391. JSTOR, www.jstor.org/stable/43267495, https://doi.org/10.2307/43267495.
[28]Vetter, Russ, et al. Predatory interactions and niche overlap between mako shark, *isurus oxyrinchus*, and jumbo squid, *dosidicus gigas*, in the California Current. *CalCOFI Rep.*, Vol. 49, 2008, oceanrep.geomar.de/id/eprint/53785/1/4444.pdf.

Deny Petition 2023-16: Reclassify Stewart's Point and Bodega Head SMRs as SMCAs to Allow Commercial Salmon Trolling

The undersigned organizations urge the FGC to reject Petition 2023-16MPA because it conflicts with key goals of the MLPA, raises significant scientific concerns, and, according to CDFW, does not align with adaptive management guidance from the DMR. CDFW also notes that the petition contradicts the original purpose of the two SMRs, could create enforcement challenges, and may unintentionally increase pressure on groundfish species.

Conflicts With MLPA Goals

Petition 2023-16 is inconsistent with MLPA Goals 1, 2, and 6. It proposes reducing protections in two SMRs to allow commercial salmon trolling at a time when salmon populations are at historic lows[29], [30]. The commercial salmon fishery has been closed for three consecutive years (2023–2025) due to extremely low abundance driven by multi-year drought, warming waters, harmful algal blooms, and wildfire-related impacts on watersheds. Introducing new fishing pressure in SMRs would add stress to a species already in crisis, directly contradicting MLPA Goal 1, which requires protecting and maintaining species abundance.

The petition also conflicts with MLPA Goal 2, which prioritizes sustaining and rebuilding depleted, economically valuable species. Salmon clearly meet both criteria: they are economically important and severely depleted. Reclassifying SMRs as SMCAs to increase commercial harvest opportunities during a period of population collapse runs counter to the MLPA's conservation mandate. Finally, weakening protections in Stewart's Point and Bodega Head SMRs would undermine the integrity of the statewide MPA network, violating MLPA Goal 6. SMRs serve as the backbone of the network, and reducing their protection level diminishes the connectivity and ecological function the MLPA requires.

Scientific Concerns

While the petition correctly notes that climate change threatens salmon, its proposed action does nothing to address the root causes of salmon decline. Research shows that warming water temperatures and reduced streamflow have harmed salmon throughout their life cycle, contributing to long-term reductions in abundance[31]. Allowing take in SMRs would not mitigate these climate-driven stressors and would remove safeguards that currently allow salmon to recover and safely hunt for prey within those MPAs.

Recent scientific studies underscore the importance of maintaining strong protections. A 2023 study by Hamilton, Kennedy, and colleagues found that MPAs, despite facing climate stressors,

[29] PFMC. 2026. Review of 2025. Ocean Salmon Fisheries.
[30] CDFW. 2026. Chinook Salmon.
[31] Siegel, Jared E. and Crozier, Lisa G. "Impacts of Climate Change on Salmon of the Pacific Northwest: A review of the scientific literature published in 2019". 2020, https://doi.org/10.25923/jke5-c307

can function as climate refugia that buffer species from the worst impacts of warming[32]. Similarly, Smith et al. (2025) examined ecological communities in Central Coast MPAs before, during, and after the 2014–2016 marine heatwaves[33]. While MPAs did not prevent all climate-driven changes, some communities inside MPAs experienced less disruption than reference sites, and MPAs continued to support higher fish biomass, abundance, and diversity even during extreme heat events.

These findings suggest that maintaining the integrity of the existing MPA network is more likely to support the resilience of salmon and HMS under climate change than weakening SMRs to expand commercial fishing allowances. Strong, fully protected areas provide ecological stability that can help species, including salmon, better withstand climate-related pressures.

Deny Three Actions with Petition 2023-18: Modifications to allowed uses at several Santa Barbara Channel MPAs

The undersigned organizations urge the FGC to reject Petition 2023-18MPA because it is inconsistent with the goals of the MRWG and the MLPA and lacks scientific justification for removing protections for seabirds and pinnipeds. We support CDFW's recommendation to deny actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7, which would reduce protections for seabird and pinniped populations and weaken ecological protections. We also support CDFW's recommendation to support action 2023-18MPA_2 to continue support for the Marine Monitor (M2) radar at Point Conception SMR, because it aligns with the goals of the MLPA and the DMR recommendations regarding improving MPA enforcement.

Inconsistent With MRWG and MLPA Goals

Actions 2023-18MPA_5, 2023-18MPA_6, and 2023-18MPA_7 propose removing the Special Closures on San Miguel Island and Anacapa Island which were established prior to the creation of the MPA network to protect seabird and pinniped populations from human disturbance.[34] San Miguel Island is home to one of the largest pinniped rookeries and haul-out areas in the country and pinnipeds are highly sensitive to disturbance, especially during pupping and breeding, when disturbance can lead to reduced reproductive success or pup abandonment.[35] Similarly,

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[32] Hamilton, Susan L, et al. "Variable Exposure to Multiple Climate Stressors across the California Marine Protected Area Network and Policy Implications." *Ices Journal of Marine Science,* vol. 80, no. 7, 26 July 2023, pp. 1923–1935, https://doi.org/10.1093/icesjms/fsad120.
[33] Smith, Joshua G, et al. "Conservation Benefits of a Large Marine Protected Area Network That Spans Multiple Ecosystems." *Conservation Biology*, 9 Jan. 2025, https://doi.org/10.1111/cobi.14435
[34] National Park Service. "Marine Protected Areas - Channel Islands National Park". https://www.nps.gov/chis/learn/nature/marine-protected-areas.htm. Accessed 23 March 2026.
[35] Lowry, Mark S., Elizabeth M. Jaime, and Jeffrey E. Moore. 2021. Abundance and distribution of pinnipeds at the Channel Islands in southern California, central and northern California, and southern Oregon during summer 2016–2019. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-656. https://doi.org/10.25923/6qhf-0z55

Anacapa Island is home to the largest breeding colony of California brown pelicans in the world[36],[37].

Brown pelicans are extremely sensitive to noise and human disturbance, particularly during nesting when disturbance can cause nest abandonment[38]. Removing protections threatens these sensitive populations and conflicts with MRWG Goal 1 and MLPA Goals 1 and 2 which aim to protect populations of interest and the natural diversity and abundance of marine life.

Conclusion

We urge the FGC to reject Petitions 2023-14, 2023-15, 2023-16, and 2023-18 to ensure that California's marine ecosystems remain resilient, healthy, and protected for future generations.

Thank you for your leadership and for considering these comments.

Sincerely,

Organizations[39]

Tomas Valadez
California Policy Manager
Azul

Kayla Feairheller
CEO and Founder
Bleu World Corporation

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Barbara Brydolf
President Alta Peak Chapter
California Native Plant Society

Sharon Musa
External Affairs Manager
Catalina Island Conservancy

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[36] National Park Service. Restoring Anacapa Island: Seabird Habitat - Channel Islands National Park. https://www.nps.gov/chis/learn/nature/restoring-anacapa-island-sea-bird-habitat.htm. Accessed 24 March 2026.
[37] California Department of Fish and Wildlife. Anacapa Island Special Closure. Version 2, September 2022. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=104293.
[38] Anderson 1998. Dose-response relationships between human disturbance and brown pelican breeding success.
[39] Alphabetical by organization name

Suzanne Hume
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Dan Silver
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Laura Deehan
State Director
Environment California

Pamela Heatherington
Director
Environmental Center of San Diego

Azsha Hudson
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Environmental Defense Center

Laura Hunter
Board Member
Escondido Neighbors United

Suzie Fortner
Executive Director
Friends of the Dunes

James Peugh
Chair
Friends of Famosa Slough

Michael Wellborn
Board President
Friends of Harbors, Beaches and Parks

Daniel Watman
Friends of International Friendship Park

Karin Zirk, Ph.D.
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Friends of Rose Creek

Carissa Cabrera
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Sachamama

Adriana Guerrero-Nardone
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Salted Roots

Muriel Spooner
Co-Chair Conservation Committee
San Diego Bird Alliance

Michael Blum
Principal
Sea of Clouds

Jack Eidt
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Katie O'Donnell
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WILDCOAST

Individuals[40]

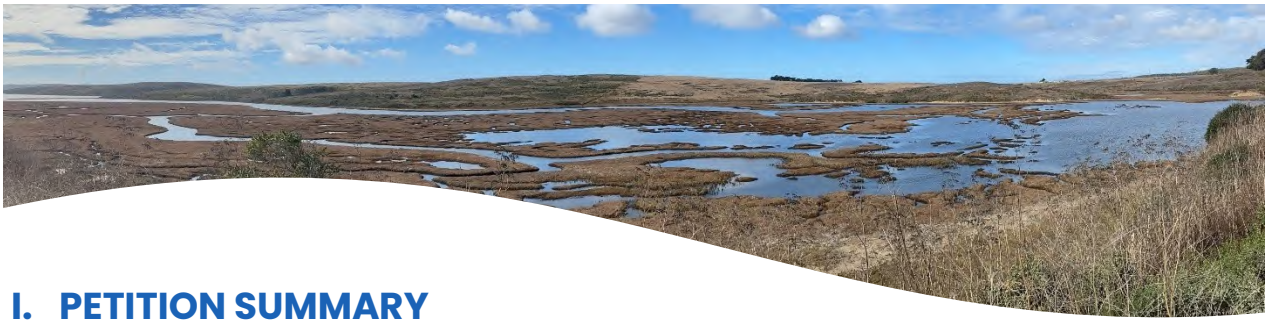
Natalie Borchardt, Senior Manager Natural Resources

MV Eitzel, Professional Researcher at University of California, Davis

[40] Individuals are signing onto this letter for themselves, and are not signing on behalf of their organization. In other words, their affiliation with an organization is not an endorsement by the organization, but only by the individual person.

California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition:

Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species (2023-15MPA_AM)



I. PETITION SUMMARY

CFGC Tracking Number	2023-15MPA_AM
Petition Contact/Affiliation	Blake Hermann
Number of Proposed Actions	3
Affected MPAs	Footprint SMR, Gull Island SMR, Santa Barbara Island SMR
Petition Summary	Reclassify three State Marine Reserves/Federal Marine Reserves (SMR/FMRs) in the Northern Channel Islands as State Marine Conservation Areas/Federal Marine Conservation Areas (SMCA/FMCAs) to allow use of Deep Set Buoy Gear (DSBG), pending the potential establishment of a DSBG fishery in state waters, commercial take of swordfish (*Xiphias gladius*) by harpoon, and one of six options representing various combinations of recreational and/or commercial take of highly migratory species (HMS) or pelagic finfish, and possession of coastal pelagic species (CPS). Petitioner includes options for partial reclassification of two of the three marine protected areas (MPAs) into inshore limited take or No-take MPAs/offshore limited take MPAs, with the portion of the existing MPA that extends into federal waters assuming the same regulations as the offshore portion in state waters. Target species and gear options proposed are intended to limit ecosystem impacts due to the selective nature of the fishing gear.
Link to StoryMap page	2023-15MPA_AM

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA MARINE PROTECTED AREAS

March 2026

II. CDFW RECOMMENDATIONS AND BRIEF JUSTIFICATION

Note: If a change to the Marine Protected Area (MPA) regulations is not needed to address the proposed change, California Department of Fish and Wildlife (CDFW) did not evaluate the proposed change using the framework. However, CDFW may recommend an alternative pathway to achieving the desired outcome of the proposed change.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-15MPA_1_AM2 Reclassify Footprint SMR/FMR to an SMCA/FMCA to allow use of DSBG, pending the potential establishment of a DSBG fishery in state waters; commercial take of swordfish by harpoon; and one of six options representing various combinations of recreational and/or commercial take of HMS or pelagic finfish by hook-and-line and/or spear, and possession of CPS (Table 1).	The petitioner's stated intent for the proposed change is that HMS and pelagic finfish, including swordfish, were not intended to be protected by this MPA, and that take of these species will provide economically beneficial sustainable commercial fishing opportunities while minimally impacting the ecosystem due to the selective nature of the gear.	**Deny petition actions 2023-15MPA_1_AM2, 2023-15MPA_2_AM2 and 2023-15MPA_3_AM2.** The proposed change, to reclassify Footprint SMR/FMR to an SMCA/FMCA to allow use of DSBG, commercial take of swordfish by harpoon, and various combinations of other recreational and/or commercial take, does not advance adaptive management recommendations from the Decadal Management Review or address a current or emerging MPA management challenge. Furthermore, the change would conflict with the original goals of these MPAs, create enforcement feasibility issues, and require coordination and a corresponding rulemaking with the National Oceanographic and Atmospheric Administration (NOAA) Channel Islands National Marine Sanctuary (CINMS). CINMS has not indicated to date to CDFW that protection level modifications appear needed in order to better support the goals established for these MPAs. There is not sufficient evidence to demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-15MPA_2_AM2 Reclassify Gull Island SMR/FMR to an SMCA/FMCA, or partially reclassify into an onshore portion with stronger take protections and an offshore portion with fewer restrictions. Within at least the offshore area, allow use of DSBG pending the potential establishment of a DSBG fishery in state waters; commercial take of swordfish by harpoon; and one of six options representing various combinations of recreational and/or commercial take of HMS or pelagic finfish by hook-and-line and/or spear, and possession of CPS (Table 1).	See 2023-15MPA_1_AM2.	**Deny.** See 2023-15MPA_1_AM2.

Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-15MPA_3_AM2 Reclassify Santa Barbara Island SMR to an SMCA, or partially reclassify into an onshore portion with stronger take protections and an offshore portion with fewer restrictions. Within at least the offshore portion, allow use of Deep Set Buoy Gear (DSBG) pending the potential establishment of a DSBG fishery in state waters; commercial take of swordfish by harpoon; and one of six options representing various combinations of recreational and/or commercial take of HMS or pelagic finfish by hook-and-line and/or spear, and possession of CPS (Table 1).	See 2023-15MPA_1_AM2.	**Deny.** See 2023-15MPA_1_AM2.

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

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

Tribal Components Questions	Answer and Explanation
Was the petition submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor? If yes, a. Does the proposed change explicitly aim to advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area? b. Is the proposed regulatory change explicitly linked to a tribe or tribes? (i.e. tribal exemption, tribal take only MPA, or new MPA for co-management).	No, this petition was not submitted by a tribe or representative designated by a tribe and does not have a tribal co-sponsor.

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

IV. PETITION EVALUATION

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-15MPA_1_AM2, _2_AM2, AND _3_AM2

The petitioner has requested that three SMRs/FMRs in the Northern Channel Islands (Footprint, Gull Island, and Santa Barbara Island SMRs/FMRs) be reclassified to allow take of select species. These No-take MPAs extend beyond the 3 nautical mile (nm) state waters boundary to the 6 nm CINMS boundary in federal waters. The purpose of these federal reserves within the CINMS is to "further the protection of Sanctuary biodiversity and to complement the state's marine reserves." However, the petitioner seeks to open these No-take MPAs to increase opportunities for take of HMS[2] (as defined in California Code of Regulations (Cal. Code Regs.), title (tit.) 14, § 1.49) and pelagic finfish[3] (as defined in Cal. Code Regs., tit. 14, § 632, subdivision (subd.) (a)(3)) including swordfish, using a variety of gear types intended to minimize impact to other species and habitats within the MPAs. The proposal also includes an allowance for possession of CPS[4] (Cal. Code Regs., tit. 14, § 1.49). The proposed change aims to address a number of problems stated by the petitioner. Firstly, the petitioner states that, "The problem created by [the MPAs established in the Northern Channel Islands in 2003] was the unintentional protection of seasonal pelagic and highly migratory species that migrate into Southern California in the summer months." The petitioner also asserts the proposed action to allow these activities would resolve, "a large conflict in these MPAs" related to commercially targeted swordfish that are, "legally taken" (i.e., hooked or harpooned) outside of an MPA but that may require gear retrieval within an MPA's boundaries due to movement by the fish and associated gear during the soak period. The petitioner further asserts that local naval closures result in limited and unpredictable fishing area availability in the Northern Channel Islands at any given time, which could be mitigated by providing access to areas that currently prohibit take (See response to Question 7b in the evaluation framework below for a complete list of concerns raised by the petitioner).

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

[3] northern anchovy (*Engraulis mordax*), barracudas (*Sphyraena* spp.), billfishes* (family *Istiophoridae*), dolphinfish (*Coryphaena hippurus*), Pacific herring (*Clupea pallasii*), jack mackerel (*Trachurus symmetricus*), Pacific mackerel (*Scomber japonicus*), salmon (*Oncorhynchus* spp.), Pacific sardine (*Sardinops sagax*), blue shark (*Prionace glauca*), salmon shark (*Lamna ditropis*), shortfin mako shark (*Isurus oxyrinchus*), thresher sharks (*Alopias* spp.), swordfish (*Xiphias gladius*), tunas (family Scombridae) including Pacific bonito (*Sarda chiliensis*), and yellowtail (*Seriola dorsalis*). *Within the billfish family, commercial take of marlin is prohibited.

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

The petitioner's proposal for the Gull Island and Santa Barbara Island MPAs includes two alternatives: reclassifying the entire SMR as an SMCA, or establishing a new MPA cluster, with an onshore portion with stronger take protections (either a No-take SMR or a restrictive limited-take SMCA) and an offshore portion with fewer restrictions. The proposal for Footprint SMR/FMR does not include nearshore/offshore options, as it is in the channel between Santa Cruz and Anacapa Islands and thus does not border the mainland coast.

The petition proposes expanding opportunity within the new SMCAs by allowing use of deep-set buoy gear (DSBG), allowing commercial take of swordfish by harpoon, and selecting one of 6 options for other commercial and/or recreational take of HMS and pelagic finfish, as well as possession of CPS. Gear types would include hook and line, no-bottom contact hook and line, and/or spear (see Table 1 for all proposed options).

The petitioner also requests consideration of an allowance for DSBG inside the affected MPAs, pending any potential establishment of a DSBG fishery by the California Fish and Game Commission (CFGC). DSBG is currently not permitted for use in California state waters, except for an active experimental fishing permit (EFP) issued by CDFW which allows limited testing of DSBG by specific permit holders, including in the area around the Northern Channel Islands.

To facilitate analysis of the various options, CDFW distilled each variation of the petitioner's proposal into three proposed actions, Footprint (2023-15MPA_1_AM2), Gull Island (2023-15MPA_2_AM2), and Santa Barbara Island (2023-15MPA_3_AM2). CDFW evaluated the proposed actions as a whole because the analysis of redesignating all or portions of these SMR/FMRs to SMCA/FMCAs to allow commercial or recreational take of the proposed species (HMS/pelagic finfish, swordfish, plus CPS possession) using any of the proposed gear types (hook and line, no-bottom contact hook and line, spear, harpoon), is similar regardless of the particular location or variation considered. As redesignating the portions of the three SMR/FMRs that occur in federal waters is not within CFGC authority, CDFW focused the petition evaluation on proposed changes specified within state waters. In considering and weighing decisions to amend portions of the MPA Network around the Channel Islands, it is important to note the Islands MPAs were established through a joint state/federal community-based process, respective state and federal rule making processes with aligned MPA goals and regulations, and has been co-managed by the state, CINMS, and Channel Islands National Park.

Although the petitioner asserts the proposed options in the petition align with one or more of the MPA Master Plan objectives, CDFW's evaluation finds the petition (including all six options for the three affected SMR/FMRs):

- Is inconsistent with the goals of these MPAs as stated in the Northern Channel Islands MPA planning process,
- Does not align with the original intent of the MPAs,
- Does not address a current or emerging MPA management challenge, and
- Would not advance management of the MPA Network.

The petition proposal is inconsistent with the goals of these SMR/FMRs defined during the Northern Channel Islands MPA planning process, and these goals remain relevant today, including:

- To protect representative and unique marine habitats, ecological processes, and populations of interest; to identify and protect multiple levels of diversity (e.g. species, habitats, biogeographic provinces, trophic structure, and
- To set aside areas which provide physical, biological, and chemical functions (See NOAA 2007a and 2007b for goals of the Northern Channel Islands MPA planning process).

These SMR/FMRs were intentionally designed and placed with ecosystem-level protection objectives in mind. Although the Marine Reserves Working Group did not identify HMS and pelagic finfish, including swordfish, as species of interest or likely to benefit from MPAs during the Northern Channel Islands MPA planning process, the affected SMR/FMRs continue to offer refuge to individuals of these species when they are present and may be used for biological functions (e.g., swordfish basking).

Currently, Gull Island and Santa Barbara Island SMR/FMRs serve as part of the backbone of California's MPA Network, facilitating habitat and resource protection and ecological connectivity. Some of the proposed options would result in the current Level of Protection (LOP) being reduced from Very High to Moderate-low, which would result in these MPAs losing their status as habitat replicates. This has potential to compromise ecological connectivity objectives for the MPA Network, including between the Northern Channel Islands and the mainland coast. While the petitioner offers take options to allow these MPAs to maintain their replicate status (e.g., some inshore/offshore options), the MPAs would no longer offer the highest levels of protection or serve their designed function in the MPA Network as SMR/FMRs. All three MPAs and their No-take designations were expanded into federal waters in 2006 and 2007 by NOAA regulations cited in the Federal Register (See NOAA 2007b). Thus, redesignating these No-take MPAs as partial take MPAs in state waters would result in misalignment with regulations in the adjoining No-take FMRs. Redesignating the portions of the three MPAs that occur in federal waters is not within CFGC authority. Since the implementation of these MPAs, NOAA Sanctuaries has not indicated to CDFW that protection level modifications appear needed in order to

better support the goals established for these MPAs. The petition is currently under review by CINMS staff.

The petition proposal to partially or fully reclassify select Channel Island SMR/FMRs to SMCA/FMCAs is anticipated to present enforcement feasibility challenges due to increasing take regulation complexity combined with options for the inshore/offshore design. These proposed changes could cause public confusion about spatial, regulatory, and user group differences in allowed uses in the proposed near-shore and offshore areas, leading to greater accidental or intentional non-compliance and copycat behavior.

Regarding the petitioner's request for CFGC to consider an allowance for DSBG inside the state waters of the affected SMR/FMRs, there is no current process underway to broaden the use of DSBG to state waters beyond the currently active EFP, so such an allowance would be premature.

RECOMMENDATION FOR 2023-15MPA

Given these considerations, and the information in the evaluation below, **CDFW recommends CFGC DENY the petition**, including proposed changes:

- **2023-15MPA_1_AM2**, reclassify Footprint SMR to SMCA,
- **2023-15MPA_2_AM2**, reclassify all or portions of Gull Island SMR to SMCA, and
- **2023-15MPA_3_AM2**, reclassify all or portions of Santa Barbara Island SMR to SMCA.

EVALUATION QUESTIONS

2023-15MPA_1_AM2, _2_AM2, and _3_AM2: Reclassify three Channel Island SMRs to SMCAs, or reclassify portions into inshore/offshore (limited take or No-take/limited take) MPAs, to allow one of six options representing various combinations of recreational and commercial take of highly migratory species (HMS), possession of coastal pelagic species (CPS), and recreational and/or commercial take of pelagic finfish, using various gear types, including deep-set-buoy-gear.

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

Although the petitioner asserts the proposed actions would align with the MLPA Goals and MLPA Master Plan, in the broader adaptive management framework, the proposed change would not advance management of the MPA Network. As part of California's MPA Network, the three MPAs affected by the proposed changes are intended to meet several MLPA Goals that are still relevant today, including:

- Footprint SMR: Goals 1, 2, and 5,
- Gull Island SMR: Goals 1, 2, 5, and 6, and
- Santa Barbara Island SMR: Goals 1, 2, 5, and 6

Although HMS and swordfish stocks were not identified as species of interest or likely to directly benefit from directly MPAs due to their high mobility and large geographic ranges, the affected SMR/FMRs currently offer refuge to individuals of these species when they are present and may be used for biological functions (e.g., swordfish basking). These SMR/FMRs were intentionally designed and placed with ecosystem-level protection objectives in mind.

Currently, Gull Island and Santa Barbara Island SMR/FMRs are habitat replicates within the backbone of California's MPA Network, facilitating habitat and resource protection and ecological connectivity. Some of the proposed options have the potential to compromise ecological connectivity objectives for the MPA Network, which includes connectivity between the Northern Channel Islands and the mainland coast. Thus, the impact of the proposed changes to these SMR/FMRs has the potential to be greater than the take of HMS and pelagic finfish alone. While the petitioner offers some take options to allow these MPAs to maintain their replicate status (e.g., nearshore limited take zones), they would no longer offer the highest levels of protection or serve their designed function in the MPA Network as SMRs/FMRs. Additionally, they would no longer be aligned with the FMR goals.

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

No. None of the options the petitioner proposes advance adaptive management recommendations from the Decadal Management Review (DMR). See Question 2a of Attachment 1 for the Decadal Management Review and adaptive management Recommendations.

The petitioner cites several DMR Recommendations to justify allowing fishing for HMS and pelagic finfish within the affected SMR/FMRs, characterizing this activity as now being realized as, "low impact." During the planning process, MPAs were acknowledged as not being as suitable for the protection of species that are highly mobile with large geographic ranges. However, the affected SMR/FMRs were intentionally established as No-take areas to meet MLPA Goals around ecosystem-level protection and thus, HMS and pelagic finfish are protected in these MPAs when present. While selective pelagic fishing gear may reduce direct MPA impacts, the affected SMR/FMRs were sited through extensive ecological and socioeconomic analysis and fishery stakeholder input. The petitioner's rationale for introducing pelagic fishing does not offer new information resulting from the DMR or outweigh the foundational design principles of these No-take MPAs to warrant the proposed change, and thus, would not advance MPA adaptive management recommendations.

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

No. The proposed change does not address a current or emerging MPA management challenge. The petitioner's stated intent for the proposed change is, "The problem created by [the MPAs established in the Northern Channel Islands in 2003] was the unintentional protection of seasonal pelagic and highly migratory species that migrate into Southern California in the summer months," which is not a current or emerging MPA management challenge.

The petitioner also asserts the proposed action to allow these activities would resolve, "a large conflict in these MPAs" related to commercially targeted swordfish that are, "legally taken" outside of an MPA but that may require gear retrieval within an MPA's boundaries due to movement by the fish and associated gear during the soak period. This is also not a current or emerging MPA management challenge (see response to Question 7b for more details).

See response to Question 1 regarding the goals that these MPAs are designed to meet and response to Question 8 for additional information on the background and intended purpose of these MPAs.

QUESTION 3: DOES THE PROPOSED CHANGE HAVE THE POTENTIAL TO AFFECT EXISTING CFGC NON-MPA REGULATIONS, PERMITS, OR LEASES (E.G., KELP LEASES, AQUACULTURE LEASES, EXPERIMENTAL FISHING PERMITS)?

No. However, the petition proposal includes a request for CFGC to consider an allowance for DSBG inside the state waters of the affected SMR/FMRs, pending any potential establishment of a state DSBG fishery by CFGC. DSBG is currently not permitted for use in California state waters. There is an active EFP issued by CDFW which allows limited testing of DSBG by specific permit holders, including in the area around the Northern Channel Islands (CDFW 2025). Though it is possible that this gear type may be allowed in state waters in the future, at this time it is unclear if and when CFGC might allow use of DSBG in state waters beyond the EFP.

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

Yes. The three affected SMR/FMRs extend into federal waters. Following the Northern Channel Islands MPA designation process, the state of California collaborated with NOAA to extend some of the MPAs inside of CINMS into federal waters (Fig. 1). By design, these federally designated protected areas maintain consistent regulations with the state portions of the MPAs. Redesignating the portions of the three MPAs that occur in federal waters is not within CFGC authority. Since the implementation of these MPAs, NOAA Sanctuaries has not indicated to CDFW that protection level modifications appear needed in order to better support the goals established for these MPAs. NOAA Sanctuaries is currently reviewing the petition.

The three affected SMR/FMRs are inside and co-managed with CINMS and Channel Islands National Park, both of which are federally administered. Implementation of the proposed changes would require consultation and coordination with federal authorities and would likely affect their management activities.

Regarding the petition's proposal to include DSBG as a fishing gear option within the affected SMR/FMRs, DSBG is already permitted in federal waters for those with federal HMS permits outside of MPAs, though there are additional endorsements and permits also required.

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

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

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

- The California Environmental Quality Act documents that accompanied the original rulemaking establishing these MPAs (CDFG 2002a, CDFG 2002b),
- History of the Community-Based Process on Marine Reserves at the Channel Islands National Marine Sanctuary 1999-2001 (MRWG 2002),
- NOAA's Final Environmental Impact Statement for the Establishment of Marine Reserves and Marine Conservation Areas in the Channel Islands National Marine Sanctuary (NOAA 2007a),
- NOAA's final rule on the marine reserves inside Channel Islands National Marine Sanctuary (NOAA 2007b),
- The DSBG EFP conditions (CDFW 2025), and
- Internal consultation with CDFW's Marine Enforcement District on the feasibility complications that this proposed change would introduce.

Though the petitioner provided extensive supplementary information with their petition, this information, along with other information CDFW reviewed, did not demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

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

No. CDFW has sufficient management information to proceed with the evaluation of this proposed change, including the foundational principles of the MLPA and information guiding management of MPAs and the relevant fisheries.

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

No. None of the options proposed by the petitioner were considered during the Northern Channel Islands MPA planning process. There were some proposals which did not include an MPA at Santa Barbara Island, and that area would have therefore been open to fishing as proposed in this petition (other than use of DSBG). However, in all alternatives where MPAs were considered at these sites, only SMRs were considered. None of the sites in the petition's proposal were considered for partial take SMCAs.

Following the initial proposal for the Northern Channel Islands MPAs, both the recreational and commercial fishing stakeholders returned a prioritized list of adjustments to that proposal. None of the options proposed by this petitioner were listed in the high priority requests by either group during this planning process.

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

No. CDFW recognizes that the petitioner has worked to assemble a significant volume of information in their petition and provided their rationale to consider reevaluation of the SMRs discussed. However, the information presented does not support a recommendation to grant the proposed changes in the petition. The petitioner's stated reasons and CDFW's response follows:

- According to the petitioner, since implementation, research has shown that species discussed in the petition likely do not significantly benefit from state spatial protections, as their ranges are so large and these species are so mobile that state protected areas represent a small portion of their habitat.
    - During the Northern Channel Islands MPA planning process, it was acknowledged and recognized that MPAs should not be designed to protect highly mobile species because MPAs could not be designed large enough to capture their seasonal movement patterns and large geographic ranges. Thus, areas selected and placed for No-take protection, in which ecosystem-level protection was desired, were intended to offer the highest protection to the habitat, invertebrates, and fishes with smaller home ranges.
    - Although HMS and swordfish stocks were not identified as species of interest or likely to directly benefit from MPAs due to their high mobility and large geographic ranges, the affected SMR/FMRs currently offer refuge to individuals of these species when they are present and may be used for biological functions (e.g., swordfish basking).
    - HMS and pelagic finfish may receive benefits from marine reserves even if they spend more time outside than inside marine reserves. HMS and pelagic finfish fulfill an ecosystem role within marine reserves as predators on and forage for other species. Such species may benefit from fully protected zones if their prey is concentrated in a given area or if the zones include breeding, aggregating or resting grounds. Scientific research suggests that pelagic species gather in certain spots (usually banks or ridges), particularly during critical life cycle stages. Maintaining marine reserves in these areas is beneficial as the number and size of pelagic

animals in the food web dictates what other organisms thrive or decline (NOAA 2007a).

- According to the petitioner, limited take of pelagic finfish is unlikely to negatively impact the species that each SMR, "aims to protect" (such as species of interest identified as important for each MPA in the original California Environmental Quality Act document for the project).
    - The petition proposes the use of gear types that are selective to the target species, including options for no-bottom contact hook and line. While these gear types are intended to minimize fishing impacts within the affected SMRs, the Northern Channel Islands MPA planning process, after careful consideration of socioeconomic impacts and incorporating recommendations from commercial and recreational fishing stakeholders, established these areas with the intention they would prohibit all take. This included the recognition that the MPAs would also serve to benefit depleted groundfish stocks and other species of concern at the time.
    - Per NOAA's Final Environmental Impact Statement (FEIS) concerning adopting these MPAs into federal regulation: allowing the take of pelagic species does not fully meet the goals of NOAA's action adopting these MPAs. See section 3.1.2.2 of the FEIS for a discussion on the impacts of limited take (NOAA 2007a).
- The petitioner states that the proposal would result in more equal representation of MPA types across the state (the statewide MPAs established during the MLPA Initiative planning process have a higher proportion of SMCAs than the set of MPAs established during the Northern Channel Islands MPA planning process).
    - Equal representation of MPA types across the state is not an adaptive MPA management goal. Having a higher portion of SMRs within CINMS relative to the overall Network is commensurate with a nationally and internationally recognized biologically significant area containing sensitive species and habitats.
    - Per NOAA's FEIS from when these MPAs were adopted: Marine conservation areas will not achieve the purpose and goals of the action as well as marine reserves. See sections 3.1.2.2 and 5.1.1.1 of the FEIS for more discussion on the ecological value of marine reserves compared to marine conservation areas (NOAA 2007a).
- The petitioner perceives the proposed changes to align with prior MPA management documents and processes, such as the MLPA Goals and the DMR.

  - The petition's proposal does not align with the Goals of the MLPA or the DMR Recommendations. See responses to Questions 1 and 2 for a more in-depth explanation of why not.
- The petitioner believes the proposal would support sustainable fisheries and further develop the local and state economy.
  - While MPAs may offer benefits to fisheries, specific measures intended to support sustainable fisheries should be addressed through updates to fishery management rather than revising MPA regulations. Furthermore, the marginal increase in catch that might result from the proposed change is not expected to impact sustainability or enhance the local or state economy in a measurable way.
- According to the petitioner, the proposed changes will provide streamlined regulations that are reasonably enforceable.
  - The proposed change would increase regulatory complexity, not simplify regulations, and as such, would not improve enforceability. See responses to Questions 11 and 12 for a more in-depth explanation of why not.
- The petitioner identifies concerns about commercial swordfish anglers being penalized for gear retrieval within an MPA due to a "legally taken fish" moving from outside to inside an MPA's boundaries during the soak period and resulting in punitive consequences or wasted fish.
  - A fish that is hooked or harpooned outside the MPA and ultimately retrieved inside the MPA is not 'legally taken.' 'Take' means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code § 86). Hauling a fish and associated gear aboard is part of the catching or capturing process and therefore qualifies as take. By letter of the law, even if a swordfish is hooked or harpooned outside of the MPA and then the vessel, gear and fish drift into the MPA while it is being hauled in, it technically is a violation of the regulation. On the rare occasion that this occurs, CDFW's Marine Enforcement District (MED) will investigate the incident and determine whether to issue a citation to the individual or to give a warning to the person based on all of the evidence, statements, and facts on hand. If regulations allowed for take of swordfish outside of an MPA, and subsequently allowed those taking the fish to drift inside of the MPA while they are hauling in the fish, this would weaken MED's ability to enforce MPA regulations because it would be impossible to distinguish those that drifted in from those who are deliberately taking inside an MPA and thus hiding behind such an exemption. The conflict the petitioner describes results from a misunderstanding of the regulation, not from misapplication of law enforcement. This can be resolved without an MPA

regulation amendment by fishery participants changing the location of where they fish.

- If only gear and no fish were retrieved, having gear or lines in the water and terminal tackle attached to those lines is considered an attempt to hunt, pursue, catch, capture, or kill and therefore qualifies as take. If gear targeting fish is retrieved within a No-take MPA, that is also technically a violation of the regulation, even if no fish were retrieved.

- According to the petitioner, localized U.S. Navy closures result in limited and unpredictable fishing area availability in the Northern Channel Islands at any given time.
  - This is not an MPA management issue.
  - While any impact may seem significant for those who experience it, NOAA's economic analysis conducted for their FEIS determined that the socioeconomic impact to fisheries from NOAA's action would be minimal (NOAA 2007a).

For these reasons, opening the affected SMR/FMRs to take of HMS and pelagic finfish including swordfish is not an appropriate means of addressing the petitioner's stated problem. Additionally, there is not sufficient evidence to demonstrate that the proposed change would advance MPA adaptive management or that a change in MPA regulations is warranted.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. None of the options for proposed changes align with goals identified during the Northern Channel Islands MPA planning process. According to the planning documents, the biodiversity goal of the process was, "to protect representative and unique marine habitats, ecological processes, and populations of interest" (MRWG 2002). An objective under that goal was to set aside areas which provide physical, biological, and chemical functions. The petitioner identifies the Footprint SMR specifically as a calm area in the lee of Santa Cruz Island where basking swordfish are more easily sighted. Calm waters allow swordfish to partake in basking behavior (Sepulveda et al. 2010), which suggests these species may use these areas for biological functions and benefit from protection.

The affected SMR/FMRs were intentionally established as No-take areas to meet MLPA Goals around ecosystem-level protection; HMS and pelagic finfish are protected in these MPAs when present, and thus, the proposed change would conflict with the foundational objectives for these areas.

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

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

Footprint SMR does not currently meet the minimum size criterion. None of the proposed options would increase its size, and all would decrease its LOP by reclassifying it from an SMR to an SMCA. As a result, implementation of any option would not improve the design of Footprint SMR or the MPA Network, nor would it enhance alignment with the MLPA Science Guidelines, and thus, does not warrant a change.

Santa Barbara Island and Gull Island SMRs currently serve their designed function as habitat replicates. The proposed change under Options 1-4, without the inshore SMR/offshore SMCA, would lower the level of protection from Very High to Moderate-low, meaning they would no longer meet the minimum requirements to serve their designed connectivity role within the Network as habitat replicates. Such a change would decrease habitat replication and representation, increase spacing between habitat types, and undermine the design of these individual MPAs and the overall MPA Network.

The proposed change under Options 1-4, with the inshore SMR/offshore SMCA, would divide each of the two SMRs into an inshore SMR with a Very High LOP and an offshore SMCA with a High LOP. Options 5 and 6 would convert both SMRs to SMCAs with High LOPs. Although these options would result in the MPAs maintaining their habitat replicate status, the MPAs would no longer provide the highest LOP or serve their intended function in the MPA Network as SMRs. Therefore, implementation would not improve the design of these individual MPAs or the MPA Network, nor would it enhance alignment with the MLPA Science Guidelines.

See Question 9 of Attachment 1 for the MPA Science Guidelines and additional context. See Table 2 for more information on the protection level and habitat representation in each of these MPAs.

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

No. The options proposed in this petition would not align with Feasibility Guidelines related to enforceability. Feasible take regulations avoid precluding, “some uses while allowing other uses that are very similar" (e.g., allowing only take of HMS or pelagic finfish by a take method that can also be used for other species) and, "those which prohibit very specific gear types that must be checked on the water" (e.g., prohibited "bottom-contact gear" options).

The inshore SMR/offshore SMCA options conflict with MPA cluster orientation feasibility, "MPA clusters oriented in an alongshore fashion (stacked north/south) are preferred compared to inshore/offshore orientation." They also deviate from the MPA design guidance under “Multiple Zoning” to, “avoid having areas split to allow for different uses in different portions of an MPA.” See Question 10a of Attachment 1 for the CDFW Feasibility Guidelines.

QUESTION 10B: IF NOT, IS THERE A RATIONALE FOR MOVING FORWARD WITH THE PROPOSED CHANGE OR AN ALTERNATIVE THAT COULD MEET THE INTENT BUT BETTER ALIGN WITH FEASIBILITY GUIDELINES?

No. There is no rationale for moving forward with any of the options presented in the petition or an alternative.

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

No. None of the options presented in the petition maintain or improve enforceability of MPA regulations. Each proposed alternative adds another type and method of take to otherwise No-take MPAs and in some cases, incorporates an inshore/offshore design, which compromises enforceability of these MPAs by:

- Making it more difficult to discern if an activity is allowed when surveilling the MPA from afar,
- Increasing the potential for non-compliance with members of the public who observe the activity taking place in an MPA but are unfamiliar with the regulations, and
- Increasing the potential for the illegal take of other species.

Transitioning a third of the Channel Islands MPA Network to partial-take marine conservation areas is expected to intensify existing enforcement challenges, increasing operational costs and reducing the capacity to maintain oversight across the entire network. This is complicated by the potential for differing regulations in state and federal

waters, should CFGC and NOAA make different decisions about granting any of the changes proposed by this petition. The Channel Islands network of MPAs was intentionally designed to reduce complexity (NOAA 2007a). This includes the seamless and consistent marine zoning regulations between state and federal waters.

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

No. All options proposed in this petition would change the intent of all affected SMR/FMRs and would complicate both regulatory language and public understanding. Adding MPA regulatory language for existing No-take MPAs to include specific gear types for different species is inherently more complicated than disallowing all take.

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

No. All options proposed would reduce protection of marine resources by redesignating all or portions of the affected No-take SMR/FMRs to SMCA/FMCAs to allow commercial and/or recreational take of one or more of the following species groups: HMS, pelagic finfish (including swordfish), plus possession of CPS. Although these may not be the primary species benefitting from these MPAs, as they are highly mobile and have large geographic ranges, the affected SMR/FMRs offer refuge when they are present in the area. See response to 7b for more details on the ecological role of these species relevant to MPAs.

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

See Question 14 in Attachment 1.

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

Yes. All options proposed would increase the available area accessible within CINMS to commercially and/or recreationally fish for one or more of the following species groups: HMS, pelagic finfish (including swordfish), plus possession of CPS. These consumptive uses would therefore likely increase in these areas. However, the amount of area that would be accessible within the broader Southern California Bight in which the desired species inhabit, and where the fisheries occur, would be less than 1%. Fishing for swordfish and other pelagic and highly migratory species is currently allowed in over 80% of CINMS (data provided by NOAA Sanctuaries staff).

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

See Question 16 of Attachment 1.

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

The proposed change would increase fishing access, particularly for pelagic fishing participants and the associated coastal fishing communities of:

- Ventura Harbor and Channel Islands Harbor
- Port of Los Angeles (San Pedro)
- Santa Barbara

These communities are between ~20 nm and ~64 nm from individual areas of proposed change. See Question 17 of Attachment 1 for additional context on CFGC's response.

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

Yes. This proposed change would interact with 2023-33MPA_4, which proposes to expand the Gull Island SMR/FMR and maintain its No-take status. Thus, the proposed change to allow partial take in the Gull Island SMR/FMR is in direct conflict with proposed changes in 2023-33MPA_4.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

TABLES AND FIGURES

Table 1. The six options proposed by the petitioner for various gear types to be used for combinations of recreational and/or commercial take of HMS or pelagic finfish and possession of CPS. All of these options assume that the relevant MPA will be partially or fully reclassified from an SMR/FMR to an SMCA/FMCA. Proposed take regulations are assumed to apply to the SMCA portion of any proposal. All proposals include a request for commercial take of swordfish by harpoon. The petitioner also requests an allowance for use of DSBG inside these potential SMCAs, pending the establishment of DSBG fishery in state waters, separately from and without regard to these six 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

Table 2. MPA attributes (area, LOP, depth range, and habitat extent) of the existing Footprint, Gull Island, and Santa Barbara Island SMRs as referenced in petition 2023-15MPA. A dash (—) indicates that the MPA does not contain the habitat type. Habitat extent may be reported in linear miles or square miles, depending on data availability and Science Advisory Team (SAT) guidance.

Values shown in **bold** indicate that the MPA attribute meets the relevant science guideline established by the SAT during the MLPA Initiative planning process. An MPA contributes to habitat replication only if it first meets the minimum size (>9 sq mi) and LOP (Very High, High, or Moderate-High) criteria (i.e., first two rows must be bold).

	Footprint SMR	Gull Island SMR	Santa Barbara Island SMR
MPA Area (sq mi)	7.05	**19.93**	**12.77**
Level of Protection	**Very High**	**Very High**	**Very High**
Min Depth (m)	49.3	0	0
Max Depth (m)	534.5	698.1	588.6
Eelgrass (sq mi)	—	—	—
Kelp (mi)	—	**3.11**	1.04
Beach (mi)	—	**2.29**	0.15
Rocky Intertidal (mi)	—	**1.89**	**1.03**
Estuaries (sq mi)	—	—	—
Hard Substrate			
0-30 m (mi)	—	**2.18**	0.04
30-100 m (sq mi)	0.10	0.14	0.11
100-200 m (sq mi)	**0.16**	**0.17**	0.02
>200 m (sq mi)	**0.23**	**2.09**	—
Soft Substrate			
0-30 m (mi)	—	**2.79**	**1.24**
30-100 m (sq mi)	1.05	**3.89**	1.63
100-200 m (sq mi)	**1.53**	**3.36**	0.46
>200 m (sq mi)	**3.59**	**7.40**	0.04

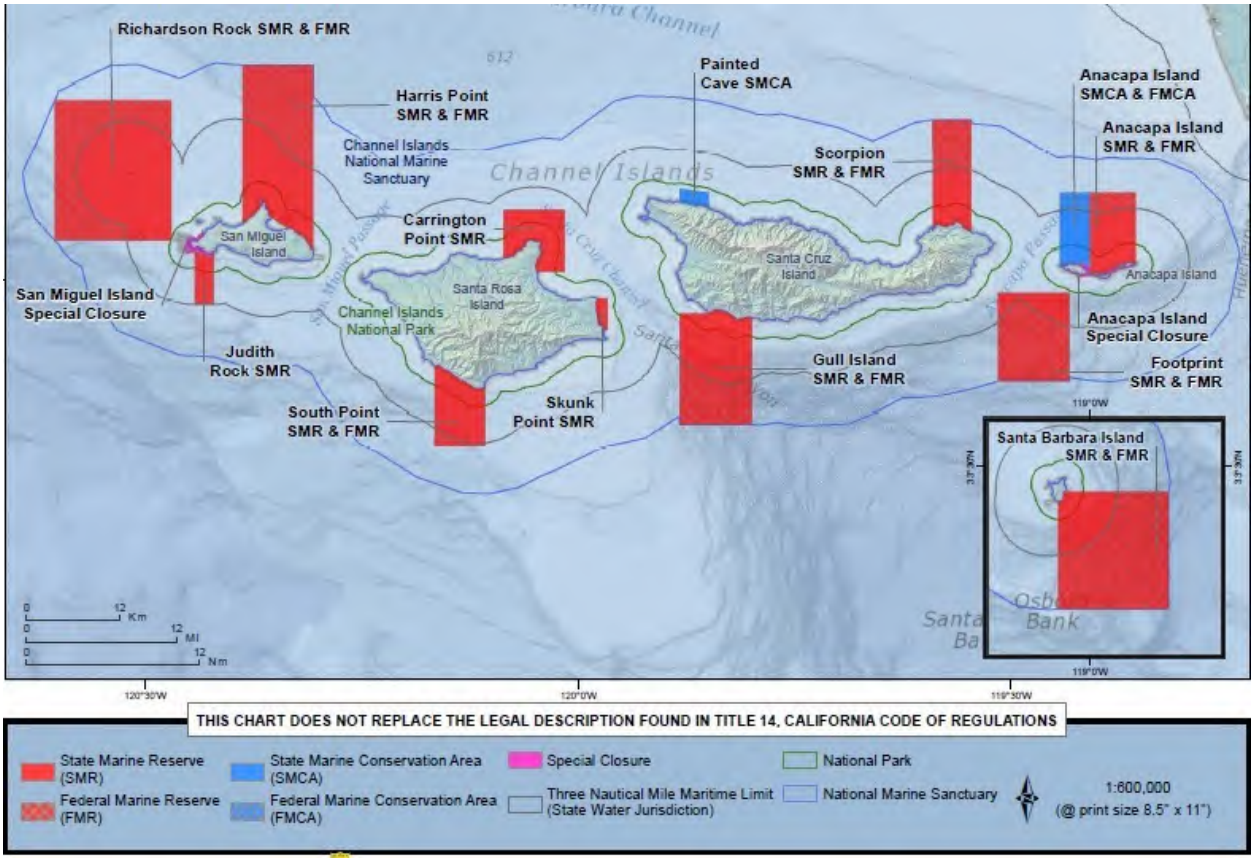

Figure 1. Map of the Northern Channel Islands showing state and federal MPAs.

CITATIONS

California Department of Fish and Game (CDFG). 2002a. Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary, vol. I.

California Department of Fish and Game (CDFG). 2002b. Environmental Document: Marine Protected Areas in the National Oceanic and Atmospheric Administration's Channel Islands National Marine Sanctuary, vol. II.

California Department of Fish and Wildlife (CDFW). 2025. Marine Fisheries: Experimental Fishing Permit No. EFPT3-001.

Marine Reserves Working Group (MRWG). 2002. History of the Channel Islands Marine Reserves Working Group Process.

National Oceanic and Atmospheric Administration (NOAA). 2007a. Channel Islands National Marine Sanctuary Final Environmental Impact Statement for the Establishment of Marine Reserves and Marine Conservation Areas.

National Oceanic and Atmospheric Administration (NOAA). 2007b. Establishment of Marine Reserves and a Marine Conservation Area Within the Northern Channel Islands National Marine Sanctuary. Federal Register 72:100 29208-29235.

Sepulveda, C.A., Knight, A., Nasby-Lucas, N., and M.L. Domeier. 2010. Fine-scale movements of the swordfish *Xiphias gladius* in the Southern California Bight. *Fisheries Oceanography* 19:4 279-289. DOI: 10.1111/j.1365-2419.2010.00543.x.

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21st April, 2026

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

Subject: **Support for Petition 2023-15MPA**

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 am writing to express our support for Petition 2023-15MPA.

This petition reflects a thoughtful and necessary approach to Marine Protected Area (MPA) management by recognizing both **socioeconomic realities** and the **biological characteristics of target species**.

From a socioeconomic standpoint, this petition acknowledges an important consideration that is often underrepresented in MPA discussions: the need to balance conservation goals with the livelihoods of working fishermen and the coastal communities that depend on them. By allowing appropriate access or adjustments within the MPA framework, this proposal helps maintain economic stability without undermining conservation objectives.

Additionally, this petition aligns with a fundamental concept that should be carefully considered in MPA management—**MPAs are static, while many marine species are not**.

In particular, **pelagic species are highly mobile**, moving freely across vast ocean areas and not confined to fixed geographic boundaries. Because of this, static spatial protections are often less

effective for managing these species compared to more adaptive, fishery-based approaches.

This petition appropriately recognizes that:

- Static MPA boundaries may not provide meaningful protection for mobile pelagic species
- Allowing access to these species does not compromise the ecological integrity of the MPA network
- Targeted allowances can support fisheries without increasing ecological risk

By incorporating these realities, Petition 2023-15MPA represents a **practical and science-informed adjustment** to existing MPA management.

Equally important, this petition does not introduce new restrictions that would displace fishing effort or increase pressure on already limited open areas. Instead, it supports a more balanced system—one that allows fishermen to operate efficiently while maintaining conservation goals.

This approach avoids the unintended consequences seen in other proposals, where restricting access without considering external effects leads to increased competition, crowding, and economic strain in remaining open areas.

In contrast, Petition 2023-15MPA provides a **measured and responsible path forward**, supporting both ecosystem management and the long-term viability of California's commercial fishing industry.

For these reasons, VCCFA supports Petition 2023-15MPA and respectfully encourages the Commission to move forward with its consideration.

Thank you for your time and continued leadership.

Respectfully submitted,

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)

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