

California Department of Fish and Wildlife's Evaluation of 2023 Decadal Management Review Marine Protected Area Petition:

Establish Co-Management at Point Buchon SMCA, Change the Name, and Add a Tribal Exemption for Santa Ynez Band of Chumash Indians at Point Buchon SMCA, and Change the Boundary at Point Buchon SMR (2023-20MPA_AM1)



I. PETITION SUMMARY

CFGF Tracking Number	2023-20MPA_AM1
Petition Contact/Affiliation	Sam Cohen, Santa Ynez Band of Chumash Indians
Number of Proposed Actions	4
Affected MPAs	Point Buchon State Marine Conservation Area (SMCA) & State Marine Reserve (SMR)
Petition Summary	Establish co-management with Santa Ynez Band of Chumash Indians, rename Point Buchon SMCA, and add a tribal take exemption for SYBCI to Point Buchon SMCA, and extend northern boundary of Point Buchon SMR to align with the point.
Link to StoryMap page	2023-20MPA_AM1



July 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
2023-20MPA_1_AMI Establish co-management with Santa Ynez Band of Chumash Indians at Point Buchon State Marine Conservation Area (SMCA).	The petitioner's stated intent is to (1) Foster co-management and tribal engagement as envisioned by State and Federal Tribal engagement and collaborative management guidelines, and (2) Designate an additional Tribal SMCA for the Central Coast Region.	Support with Alternative Pathway. During the Decadal Management Review (DMR) of California's MPA Network, a Tribal Steering Committee developed recommendations including the following near term priorities to improve state agencies' tribal engagement and relationship building efforts and create a clear pathway to tribal MPA co-management; and a long term priority to work with the California Fish and Game Commission (CFGF) and partners to better incorporate marine cultural heritage into the design of the MPA Network. CDFW may enter into tribal co-management agreements with tribes at any time and these do not require adoption and implementation through CFGF's official petition process. At the April 2026 CFGF Tribal Committee meeting, the Santa Ynez Band of Chumash Indians (SYBCI) confirmed the tribe's intent to pursue co-management with CDFW in the MPA Network through non-regulatory means. CDFW is aligned with this approach and supports advancing this proposed action through an alternative/non-regulatory pathway, consistent with the DMR Recommendations. CDFW is committed to working directly with SYBCI to explore opportunities to advance coordination and co-stewardship in Point Buchon SMCA.

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Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
2023-20MPA_2_AMI Adjust the northern boundary of Point Buchon State Marine Reserve (SMR) to align with Point Buchon.	The petitioner's stated intent is to, "support the MPA Collaborative Network's Regulatory Recommendation...to move the SMR's boundary to the north to better capture the marine area offshore the Point and to improve enforcement of the marine reserve area."	Deny. The proposed change would not result in additional habitat protection within the MPA, and does not align with the CDFW Feasibility Guidelines, which could compromise enforceability. Additionally, the petition does not include information on whether the proposed SMR boundary change would advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area. The current boundary aligns with CDFW Feasibility Guidelines as it falls on a readily determinable line of latitude (35° 15.250' N. lat.) and aligns with easily recognizable landmarks (tall flagpole and terminus of the Point Buchon trail from the parking lot). This supports compliance for shore-based and boat-based users and facilitates enforcement. Moving the boundary 350 feet (150 m) to the north could introduce enforcement challenges because it would no longer align with a readily determinable line of latitude and the SMR boundary would no longer align with the boundary of the adjacent Point Buchon SMCA. Compliance concerns raised in the petition are not supported by enforcement data, which indicate generally low citation levels since 2022 and improving trends (Table 1). Additionally, both shore- and boat-based access to the MPA at Point Buchon is limited, including within the area defined by the proposed boundary change. The onshore area adjacent to the SMR is land-owned and -operated by Pacific Gas &

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Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
		Electric (PG&E), where fishing is prohibited. Additionally, Point Buchon consists of steep cliffs and hazardous waters that naturally limit easy access by shore- and boat-based users. Consequently, the proposed change would not address a current or emerging MPA management challenge that has emerged since the DMR and would not advance management of the MPA Network.
2023-20MPA_3_AM1 Rename Point Buchon SMCA	The petitioner's stated intent is that "there are no Tribal MPAs designated within the Central Coast Region network" and therefore "SYBCI recommends that the Point Buchon SMCA be designated as a Chumash SMCA."	Grant in Concept. During the April 2026 CFGC Tribal Committee meeting, SYBCI clarified the original request, "that the Point Buchon SMCA be designated as a Chumash SMCA that will support Tribal engagement and co-management of the SMCA within the Central Coast Region network," was a request to rename the Point Buchon SMCA, rather than to redesignate the MPA. CDFW recommends CFGC work with SYBCI and other federally and non-federally recognized tribes as appropriate to identify a new name that aligns with CFGC's Naming Protected Area Policy, which states, "When identifying the name for, or an opportunity to rename, a protected area, the [CFGC] and [CDFW] will invite tribes with ancestral ties to that area to engage in meaningful information-sharing about the cultural significance of the area, and to identify traditional or contemporary tribal names for the area. In selecting a name, the [CFGC] will give significant weight to tribally identified names, with particular emphasis on restoring tribal place names. In its selection, the [CFGC] may consider combining the tribal place name with a currently used

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Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
		name that is understandable and locatable, as appropriate, to ensure accessibility and identification by the broader public while restoring tribal heritage recognition." Working with SYBCI and other federally and non-federally recognized tribes as appropriate to rename Point Buchon SMCA advances DMR Recommendations related to improving tribal coordination and co-stewardship (1-2) and to better incorporate marine cultural heritage into the design of the MPA Network (24).
2023-20MPA_4_AMI Add tribal take exemption to Point Buchon SMCA for Santa Ynez Band of Chumash Indians.	The petitioner's stated intent is that the tribal exemption process was put in place after the Central Coast Marine Life Protection Act (MLPA) Initiative planning process and they are formally requesting an exemption for SYBCI to allow gathering, ceremony, or harvest that historically occurred in the area.	Grant, pending confirmation from CFGC that the original Factual Record(s) of Current and Historical Uses previously submitted by SYBCI to CFGC for Naples SMCA, Kashtayit SMCA, Point Dume SMCA, and Anacapa Island SMCA include(s) the area contained within the proposed Point Buchon SMCA. If the previously submitted Factual Record of Current and Historical Uses does not include Point Buchon, SYBCI will need to provide this to CFGC for review, consistent with prior considerations for tribal take exemptions. During the April 14, 2026 CFGC Tribal Committee meeting discussion, SYBCI proposed to amend the original take request, and narrow the request to only add a tribal take exemption for SYBCI in Point Buchon SMCA. Following the meeting, the proposed action to amend the take request to only add a tribal take exemption for SYBCI was accepted by CFGC and referred to CDFW for evaluation.

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Petition Action ID and Proposed Action	Petitioner's Stated Rationale and Brief Justification for Proposed Actions	CDFW Recommendation and Brief Justification
		CFGC has the regulatory authority to grant tribal take exemptions to federally recognized tribes in MPAs that overlap with areas of historic and/or current uses by federally recognized tribes for specific, non-commercial uses as reflected in a factual record of use provided by the tribe (i.e., a Factual Record of Current and Historical Uses pertaining to the specific MPA location). The proposed tribal take exemption is a component to the broader suite of requests by SYBCI, including a name change and a state-level co-management framework (see proposed actions 2023-20MPA_1_AMI and 2023-20MPA_3_AMI above). CDFW notes that implementing these measures collectively serves to advance state-tribal partnership objectives. The request to add a tribal take exemption to Point Buchon SMCA for SYBCI is also aligned with the following tribally-focused DMR Recommendations, (1) improving state agencies' tribal engagement, (2) creating clear pathways for tribal MPA management within the existing MPA Network, and (24) better incorporating marine cultural heritage into the design of the MPA Network. Implementing this tribal take exemption could be an initial step for CDFW and SYBCI to develop collaborative management practices at Point Buchon that go beyond the tribal take exemption.

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

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

WAS THE PETITION SUBMITTED BY A CALIFORNIA NATIVE AMERICAN TRIBE, REPRESENTATIVE DESIGNATED BY A TRIBE OR TRIBAL ORGANIZATION, OR HAVE A TRIBAL CO-SPONSOR?

Yes, this petition was submitted by a representative of the Santa Ynez Band of Chumash Indians, hereafter referred to as SYBCI or tribe.

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?

2023-20MPA_1, 3, and 4_AMI. Yes. The petition notes that, “[Point] Buchon is a Chumash ethnohistorical village site... [and] is an area of special spiritual significance to the Chumash maritime peoples.” Each of these three proposed actions explicitly aim to advance tribal co-management, harvest, stewardship, and recognition of the cultural significance of the area.

2023-20MPA_2_AMI. Unclear. The boundary change to Point Buchon SMR appears unrelated to proposed actions 2023-20MPA_1, 3, and 4_AMI, which refer to the Point Buchon SMCA. The tribe's stated rationale for moving the Point Buchon SMR northern boundary northward states, “the SYBCI also supports the MPA Collaborative Network's Regulatory Recommendation (Row 104, Column E) to adjust the boundary of the Point Buchon SMR to the north to better capture the offshore marine area of the Point,” and “to improve enforcement of the marine reserve area.” The proposed change is cited as an ‘MPA Collaborative Network Regulatory Recommendation’ and the petition does not include information on whether the SMR boundary change would advance tribal co-management, subsistence harvesting, stewardship, and/or provide a tribal benefit through recognizing the cultural significance of an area.

¹California 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.

(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)?

2023-20MPA_1, 3, and 4_AM1. Yes. The proposed requests and regulatory changes are explicitly linked to SYBCI. See response to (a) above.

2023-20MPA_2_AM1 Unclear. See response to (a) above.

IV. PETITION EVALUATION

The petition proposed for CDFW evaluation includes one non-regulatory change and two regulatory changes for Point Buchon SMCA, and one regulatory change for Point Buchon SMR. The proposed changes and subsequent CDFW evaluation reflect the clarifications and amendments requested by the SYBCI at the April 14, 2026 CFGC Tribal Committee meeting and referred to CDFW at the April 15, 2026 CFGC meeting.

The originally submitted petition included a request for redesignation of the area to a Chumash-California co-managed MPA and a request for a broader take allowance within Point Buchon SMCA to include recreational take of finfish², invertebrates except rock scallops and mussels by hand harvest, and provisions for maintenance of pre-existing artificial structures. This would have resulted in several additions to the current Point Buchon SMCA take allowances, which currently allow the commercial and recreational take of salmon (*Oncorhynchus spp.*) and albacore (*Thunnus alalunga*).

At the April 14, 2026 CFGC Tribal Committee meeting, SYBCI provided clarification for proposed actions 1 (co-management) and 3 (renaming) and requested an amendment to proposed action 4 (take allowance). The tribe confirmed their intent for pursuing tribal co-management with CDFW and that they were not requesting specific regulatory changes but rather to continue to work with CDFW on advancing co-management of Point Buchon SMCA. They also clarified the petition request “that the Point Buchon SMCA be designated as a Chumash SMCA that will support Tribal engagement and co-management of the SMCA within the Central Coast Region network” is a request for the SMCA to be renamed to reflect co-management and acknowledge Chumash heritage. Finally, SYBCI requested to amend the original take request (broader recreational take) to instead maintain the existing recreational take allowances for Point Buchon SMCA and add a tribal take exemption for SYBCI. The original boundary change request related to Point Buchon SMR, to move the northern border to align with the point at Point Buchon, remains unchanged.

² Any species of bony fish or cartilaginous fish (sharks, skates and rays).

In summary, the petition's proposed actions, as discussed at the April 14, 2026 CFGC Tribal Committee meeting, include the following:

- 2023-20MPA_1_AMI: Establish co-management with SYBCI at Point Buchon SMCA (non-regulatory),
- 2023-20MPA_2_AMI: Adjust the northern boundary of Point Buchon SMR to align with the point at Point Buchon,
- 2023-20MPA_3_AMI: Rename Point Buchon SMCA, and
- 2023-20MPA_4_AMI: Add a tribal take exemption for SYBCI at Point Buchon SMCA.

The petition amendment (2023-20MPA_AMI) was accepted by CFGC and referred to CDFW for evaluation in April 2026.

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-20MPA_1_AMI

SYBCI proposes "co-management of the [Point Buchon] SMCA within the Central Coast Region network" where "there are no Tribal MPAs designated." The petition states that "there was very little effort by the State during the early period of the implementation of the [MLPA Initiative planning process] to consider Tribal MPAs in the network design." SYBCI further notes that "since the adoption of the MPA Network, there has been considerable evidence on the benefits of traditional ecological knowledge and other indigenous experience in marine life protection."

As described in the petition, the tribe's request for co-management was also intended to create overlap of tribal stewardship and management between the Point Buchon SMCA and the proposed Chumash Heritage National Marine Sanctuary³. The tribe indicated a desire for co-management within the state-managed SMCA.

CFGC defines co-management as a collaborative effort established through an agreement in which two or more sovereigns mutually negotiate, define, and allocate amongst themselves the sharing of management functions and responsibilities for a given territory, area, or set of natural resources (CFGC 2020). Successful co-management efforts typically share several components, such as clear governance and institutional structure, shared goals and long-term trust building, and integration of multiple worldviews and knowledge systems (Armitage et al. 2009, Berkes 2009, Ban et al. 2018, Warrior et al. 2022). In practice, this involves shared responsibility for management activities, such as monitoring, enforcement, and outreach, established through agreements developed collaboratively with tribes on a direct government-to-government basis (Berkes 2009, Ban et al. 2018, Artelle et al. 2019, Murray 2023).

³ <https://sanctuaries.noaa.gov/chumash-heritage/>

In alignment with Governor Newsom's Executive Order N-15-19, the 2020 Ancestral Lands Policy, and the California Natural Resources Agency Tribal Stewardship Policy, CDFW is committed to continuing to work with tribes towards collaborative, government-to-government co-management agreements. This commitment is intended to acknowledge and honor cultural needs by providing adequate time for tribal engagement, building partnerships, and incorporating Traditional Ecological Knowledge into a mutual understanding of co-management over ancestral lands and waters.

The petition highlights the significance of the area to the tribe, noting that, "[Point] Buchon is a Chumash ethnohistorical village site... [and] is an area of special spiritual significance to the Chumash maritime peoples." The proposed action would recognize SYBCI's deep cultural and historical ties to their ancestral lands and waters in this area and aligns with CDFW's priorities for tribal coordination and MPA governance, including improving state agencies' tribal engagement, relationship building, and creating clear pathways and building capacity for tribal MPA management within the existing MPA Network, and better incorporating marine cultural heritage into the design of the MPA Network (CDFW 2022). Tribal co-management frameworks may be established through formal agreements that do not require regulatory changes; however, as noted by McGinnis (2024), they necessitate robust collaboration and partnership-building. During the April 2026 CFGC Tribal Committee meeting, CDFW received clarification that the request for co-management would not require any regulatory changes, but that additional coordination and collaboration is needed with SYBCI to support implementation of this request at Point Buchon SMCA.

RECOMMENDATION FOR 2023-20MPA_1_AMI

Given these considerations, **CDFW recommends SUPPORT WITH AN ALTERNATIVE PATHWAY** as the proposed change does not require regulatory changes to implement. **CDFW is committed to working with SYBCI on an approach to co-management of Point Buchon SMCA.** Because this change is a non-regulatory request, it was not evaluated further within this framework.

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-20MPA_2_AMI

This petition proposes to shift the northern boundary of Point Buchon SMR 350 feet north from 35° 15.250' N to 35° 15.318' N to align with the point at Point Buchon in support of the recommendation provided by the MPA Collaborative Network with the goal of "better capturing the marine habitat offshore of the Point and to improve enforcement of the marine reserve area." The petition states, "the SYBCI supports the regulatory and boundary changes recommended by the MPA Collaborative Network's Regulatory Recommendation," but did not include any information related to cultural significance of the proposed SMR boundary change.

Point Buchon SMR encompasses more than 6.5 square miles of rocky reefs, sandy seafloor and beaches, kelp forests, and rocky intertidal areas. While expanding the SMR would minimally increase the area under protection (by 0.26 square miles, Table 2), the existing Point Buchon SMR and adjacent Point Buchon SMCA as designed already meet the Science Advisory Team (SAT) Science Guidelines established during the MLPA Initiative planning process and contribute to key MPA Network objectives as an intentionally designed MPA cluster, including habitat replication and representation. Expanding the boundary 350 feet to the north would not measurably improve the individual MPA design or MPA Network performance in this region (Table 2).

The petition raises compliance concerns associated with the Point Buchon SMR boundary but does not include specific information. The most recent MPA Collaborative Community Compliance Forum Report for San Luis Obispo County (MPACN 2020) reported that Point Buchon SMCA and SMR were the most common poaching spots in the county. Specific to the SMR, the report states, “some boats tuck in close to the coast to fish in the SMR where they feel like they will not be observed and at Disney Point.” This, however, is not consistent with CDFW enforcement’s experience at Pt. Buchon. Additionally, Disney Point is located south of Point Buchon within the SMR, not near the northern boundary of the SMR. The same report raised the concern as an ‘Issue of Elevation’ in which a proposal to install a camera or Marine Monitor radar system near the flagpole, looking south at Point Buchon was suggested.

Available enforcement data from 2016 to 2025 indicate improving trends since 2022, dropping from 30 citations in the SMR in 2022 to just 2 in 2025 (Table 1). CDFW’s Marine Enforcement District (MED) confirmed a period of low compliance in the Point Buchon SMR/SMCA complex in 2022. CDFW enforcement data shows a significant portion of these citations were related to groundfish regulations. This period followed two groundfish rulemakings, first an emergency rulemaking reducing bag limits for certain species of rockfish (CFGC 2021), followed by changes to allowed fishing depths for groundfish species (CFGC 2022), both of which can lead to an increase in citations when anglers do not stay informed of changing regulations. Compliance issues are not uncommon after regulatory changes are enacted and they typically taper off after increased outreach and enforcement. Historically, citations within Point Buchon SMR were 7 per year prior to 2019 and 2020, when 17 and 21 citations were issued, respectively. Citations dropped in 2021 to 3 but rose dramatically to 30 in 2022. Since then, citations declined to 7 in 2023, 0 in 2024 and 2 in 2025 (Table 1). MED attributes the improved compliance to additional outreach and education efforts as well as enforcement presence.

Since implementation of California’s MPA Network, targeted regulatory refinements, including adjusting MPA boundaries for clarity and maximum alignment with CDFW Feasibility Guidelines, were made following an MPA Network-wide assessment (see

Appendix G of the DMR). None of the previous MPA regulatory packages identified a need to adjust the current northern boundary at Point Buchon SMR (see Attachment 1). No new information or changing conditions since implementation has been identified that would justify revisiting the original design of the Point Buchon SMR. Moreover, the proposed boundary shift has the potential to introduce new management and enforcement challenges. The current northern boundary of the SMR intentionally aligns with the Point Buchon SMCA boundary and a readily determinable line of latitude, creating a clear and enforceable configuration. Moving the SMR boundary 350 feet to the north would offset the boundaries of the two MPAs and create a more complex, L-shaped configuration that could be confusing for the public and more difficult for enforcement personnel to monitor. The current boundary comes on shore at a prominent flagpole that is easy to see for both shore- and boat-based users and the boundary aligns with the terminus of the Point Buchon Trail from the nearest parking lot. The flagpole is maintained by PG&E, which owns the land adjacent to the SMR and operates the nearby Diablo Canyon Power Plant.

Finally, the proposal is unlikely to meaningfully increase protection of marine resources because the area north of the boundary is effectively protected from shore. Shoreline access at Point Buchon is restricted because the land is owned by PG&E. Landside access to the area is only available through the PG&E-managed trail corridor near the Diablo Canyon Power Plant. The trail is only accessible during daytime hours for part of the week. Otherwise, the trail access is behind multiple locked gates. PG&E also limits the number of hikers that can access the trail on the days that it is open, and fishing is not allowed from the trail (PG&E 2025). Even if visitors to the area attempted to fish, the steep cliffs, rocky outcrops, and heavy wave action also make fishing from shore (or close to shore by boat) difficult. Expanding the SMR boundary would therefore provide little additional benefit in an area that is well protected due to limited and sometimes difficult access, while potentially making the boundary harder to understand and enforce, particularly for offshore users.

After careful review, CDFW finds the proposal to move the northern boundary of the Point Buchon SMR 350 feet to the north:

- As proposed and when assessed against SAT Science Guidelines, would not measurably improve the ecological performance of Point Buchon SMR or the Point Buchon SMR/SMCA cluster,
- Could result in enforcement challenges,
- Does not address a current or emerging MPA management challenge that has emerged since the DMR, and
- Would not advance management of the MPA Network at Point Buchon SMR/SMCA cluster.

RECOMMENDATION FOR 2023-20MPA_2_AMI

Given these considerations, and the information in the evaluation below, **CDFW recommends CFGC DENY the proposed action** to extend the northern boundary of Point Buchon SMR 350 feet to the north.

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-20MPA_3_AMI

The petition includes a request, “that the Point Buchon SMCA be designated as a Chumash SMCA that will support Tribal engagement and co-management of the SMCA within the Central Coast Region network.” During the April 2026 CFGC Tribal Committee meeting, CDFW received clarification that this request is to *rename* (rather than redesignate) Point Buchon SMCA.

The Chumash people have been stewarding the California coast since time immemorial. One hundred and forty-eight historic Chumash village sites have been identified from Malibu to San Luis Obispo, and on the Channel Islands (Glassow 1995). Given the cultural significance of the area to the Chumash peoples, and the establishment of the Chumash Heritage National Marine Sanctuary in 2024 to the south, inclusion of the Chumash name in the MPA would provide recognition of the original stewards of the land and waters around Point Buchon. It also aligns with the following DMR Recommendations: (1) Improve state agencies’ tribal engagement and relationship building efforts, (2) Create a clear pathway to tribal MPA management, and (24) Work with CFGC and partners to better incorporate marine cultural heritage into the design of the MPA Network.

CDFW finds the proposed change:

- Acknowledges the role of the Chumash peoples as the original stewards of the land and waters in the area, and
- Is an initial step towards advancing state commitments and DMR Recommendations regarding the advancement of tribal stewardship in MPA management and governance.

The proposed name should align with the CFGC Naming Protected Areas Policy⁴, which states:

“When identifying the name for, or an opportunity to rename, a protected area, the [CFGC] and [CDFW] will invite tribes with ancestral ties to that area to engage in meaningful information-sharing about the cultural significance of the area, and to identify traditional or contemporary tribal names for the area. In

⁴ [California Fish and Game Commission Policy webpage available at this link, including their policy on naming protected areas](#)

selecting a name, the [CFGF] will give significant weight to tribally-identified names, with particular emphasis on restoring tribal place names. In its selection, the [CFGF] may consider combining the tribal place name with a currently-used name that is understandable and locatable, as appropriate, to ensure accessibility and identification by the broader public while restoring tribal heritage recognition.”

RECOMMENDATION FOR 2023-20MPA_3_AMI

Given the above considerations, **CDFW recommends CFGC GRANT IN CONCEPT 2023-20MPA_3_AMI** and that CFGC work with SYBCI and any other interested tribes to identify a name for Point Buchon SMCA that aligns with the CFGC Naming Protected Areas Policy.

The proposed name change was not evaluated further.

EVALUATION NARRATIVE AND OVERVIEW FOR 2023-20MPA_4_AMI

The proposed action for 2023-20MPA_4_AMI in the original petition included a request to replace the existing take at Point Buchon SMCA (recreational and commercial take of salmon and albacore (Cal. Code Regs. Tit. 14, § 632(b)(94)) with the following:

“(B) Area restrictions defined in subsection 632(a)(1)(C) apply, with the following specified exceptions:

1. The recreational take of finfish⁵ [subsection 632(a)(2)], invertebrates except rock scallops and mussels by hand harvest is allowed.
2. Take pursuant to activities authorized under subsection 632(b)(97)(C) is allowed.
3. The following federally recognized tribe is exempt from the area and take regulations found in subsection 632(b)(97) of these regulations and shall comply with all other existing regulations and statutes: Santa Ynez Band of Chumash Indians.”

At the April 14, 2026, CFGC Tribal Committee meeting, SYBCI requested an amendment to retain the existing take allowances for Point Buchon SMCA and add a tribal take exemption for SYBCI to expand SYBCI tribal exemptions into the Central Coast region for cultural gathering, ceremony, or harvest that historically occurred in the area. This amendment was later referred to CDFW by CFGC and evaluated here.

⁵ Any species of bony fish or cartilaginous fish (sharks, skates and rays).

Tribal take in MPA regulations, which corresponds with tribal exemptions for area-specific take restrictions, applies to “federally recognized tribes⁶.” As stated in regulations, “Members taking living marine resources under this provision are subject to current seasonal, bag, possession, gear and size limits in existing Fish and Game Code statutes and regulations of the commission, except as otherwise provided for in subsection 632(b).”

As stated above, during the Central Coast MLPA Initiative planning process that occurred from 2005–2007, Tribal Take⁷ in MPAs had not yet been defined in regulation. Several years later, during the regulatory process to adopt the final regional MPA array (in the North Coast), three options were developed to accommodate tribal take within MPAs. CFGC chose Tribal Option 1 to provide specific non-commercial tribal uses by federally recognized tribes and asked federally recognized tribes to submit a factual record of historic and current uses in specific geographies, other than SMRs (CFGC 2011). CFGC directed CDFW to develop regulatory language defining tribal take using specific criteria, including that all tribal take must be consistent with existing regulations (CFGC 2011). CFGC’s action to amend Cal. Code Regs. Tit. 14, section 632 (a), to add provisions relating to “Tribal Take,” along with additional amendments to subdivision (b) pertaining to the North Coast Study Region, was approved by the Office of Administrative Law on November 19, 2012, and became effective December 19, 2012 (CFGC 2012). This change enabled CFGC to grant tribal take exemptions in MPAs that overlap with areas of historic and/or current uses by federally recognized tribes for specific, non-commercial uses as reflected in a factual record of use provided by the tribe (i.e., a “Factual Record of Current and Historical Uses” pertaining to the specific MPA location).

Following adoption of the “Tribal Take” definition in 2012, CFGC directed CFGC staff to inform federally recognized tribes about the pathway for a tribal take exemption. CFGC staff sent a letter to all tribes, notifying them of the new pathway for a tribal take exemption, and inviting them to request tribal take exemptions for any SMCA where they could provide a Factual Record, excluding within SMRs. Several tribes, including SYBCI, petitioned CFGC to add exemptions to existing MPAs in other regions⁷. Twenty-five tribes in California currently hold tribal exemptions in one or more MPAs in the MPA Network (Cal. Code Reg. Tit. 14, § 632).

⁶ “Federally recognized tribe” means any tribes on the List of Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, published annually in the Federal Register.

⁷ California state MPAs with tribal exemptions for take include: Pyramid Point SMCA, Point St. George Offshore SMCA, Reading Rock SMCA, Samoa SMCA, South Humboldt Bay State Marine Recreational Management Area, Big Flat SMCA, Double Cone Rock SMCA, Ten Mile Beach SMCA, Ten Mile Estuary SMCA, Big River Estuary SMCA, Navarro River Estuary SMCA, Naples SMCA, Kashtayit SMCA, Point Dume SMCA, and Anacapa Island SMCA.

Granting a tribal take exemption for SYBCI in Point Buchon SMCA is an opportunity to advance tribal co-stewardship within the existing MPA Network and would provide a regulatory pathway to recognize the cultural importance of the land and waters of Point Buchon to the Chumash maritime peoples. When SYBCI submitted petitions for tribal take exemptions for other MPAs further south in the Santa Barbara Channel and on the Malibu Coast, they provided information about historic occupation and use of the coast by the Chumash people prior to European colonization. This included a map of Chumash country, originally created for a report to the National Park Service, which identified Chumash village sites along the Southern and Central Coasts. Per this map, the Chumash villages of Pelpatsu and Chanu were just to the north and south of the modern Point Buchon MPA cluster, respectively (McLendon and Johnson, 1999). Tribal exemptions for the SYBCI have been adopted by CFGC within four South Coast MPAs: Naples SMCA, Kashtayit SMCA, Point Dume SMCA, and Anacapa Island SMCA. Granting a tribal exemption for SYBCI for Point Buchon SMCA and leveraging the existing tribal exemptions for SYBCI in the four South Coast MPAs, poses a near-term opportunity to advance co-management between the tribe and CDFW within the existing MPA Network now, while broader discussions regarding co-management across the entire MPA Network are ongoing.

The proposed tribal take exemption is a component to the broader suite of requests by SYBCI, including a name change and a state-level co-management framework (see overview and narrative for proposed actions 2023-20MPA_1_AMI and 2023-20MPA_3_AMI). CDFW notes that implementing these measures collectively serves to advance state-tribal partnership objectives and acknowledges the unique cultural relationship between the Chumash peoples and the Point Buchon marine environment. After careful review, CDFW finds the proposed change:

- Advances DMR Recommendations focused on strengthening tribal stewardship and capacity in MPA management and governance,
- Acknowledges the important role of the Chumash peoples as the original stewards of the land and waters in the area,
- Will provide more opportunities for SYBCI tribal members to harvest for cultural practices and ceremonial purposes, and
- Provides a near-term opportunity to bolster tribal co-management within the existing MPA Network.

CDFW recognizes that the requested tribal take exemption has potential to serve as an initial regulatory milestone that would complement the broader goal of tribal co-management. Implementing this exemption would provide a structured opportunity for CDFW and SYBCI to develop collaborative management practices at Point Buchon that can serve as a model for the wider MPA Network.

RECOMMENDATION FOR 2023-20MPA_4_AMI

Given these considerations, **CDFW recommends CFGC GRANT the proposed change** to add a tribal exemption at Point Buchon SMCA for SYBCI, pending confirmation from CFGC that the original Factual Record(s) of Current and Historical Uses previously submitted by SYBCI to CFGC for Naples SMCA, Kashtayit SMCA, Point Dume SMCA, and Anacapa Island SMCA include(s) the area contained within the proposed Point Buchon SMCA. If the previously submitted Factual Record of Current and Historical Uses does not include Point Buchon, SYBCI will need to provide this to CFGC for review, consistent with prior considerations for tribal take exemptions. The proposed action was not further evaluated within the evaluation framework.

EVALUATION QUESTIONS

2023-20MPA_2_AMI: Adjust the northern boundary of Point Buchon SMR to align with Point Buchon.

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 MPA 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 MPA 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.

Point Buchon SMR, acting as an MPA cluster with Point Buchon SMCA, was explicitly designed to meet Goals 1-6. It protects a variety of habitats including sandy beach, rocky intertidal, offshore pinnacles, and hard and soft benthic habitats. It benefits bird and marine mammal species of concern by protecting forage species, as well as larval sources, and enhances reproductive capacity of nearshore and midwater fish and invertebrate species. While the petition states that expanding the boundary slightly to the north would “better capture the offshore marine area of the Point,” it does not state what specifically would be protected in the 0.26 square miles that would be added by the expansion. Point Buchon SMR was specifically designed to meet the size and spacing thresholds to act as a habitat replicate for sandy beach, rocky intertidal, pinnacles, kelp, and hard and soft bottom habitat (see Question 9 of Attachment 1 for the SAT Science Guidelines and additional context).

While the proposed expansion of Point Buchon SMR may provide limited additional protection for the natural diversity and abundance of marine life that occurs north of the current boundary, the current boundaries were carefully selected during the MLPA Initiative planning process to meet the Goals of the MLPA, the Feasibility Guidelines, and the SAT Science Guidelines established during the MLPA Initiative planning process. As designed, Point Buchon SMR aims to meet Goals 1-6 and moving the boundary 350 feet to the north would offer no further benefit to the design of the Point Buchon SMCA, the Point Buchon SMCA/SMR complex, or the ecological functioning of the MPA Network.

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 that has emerged since the DMR. While SYBCI states that they support the MPA Collaborative Network's proposed change to expand the boundary of Point Buchon SMR to the north to "better capture the offshore marine area of the Point and to clarify the boundary of the SMR," the proposed change does not correspond with any of the Decadal Management Review Prioritized Recommendations⁸.

Following a previous MPA Network-wide assessment to ensure maximum alignment with the Feasibility Guidelines, there were two regulatory packages that specifically clarified and corrected MPA boundaries throughout the MPA Network to improve boundary clarity for shore- and boat-based users, and ultimately, boundary enforceability (see Introduction in Attachment 1, and Appendix G of the DMR). The current northern boundary at Point Buchon SMR was not identified as needing refinement.

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. Point Buchon SMCA and SMR both occur across two administrative kelp beds (206, which is currently closed, and #205, which is currently open). Extending the boundary north would only expand the MPA within kelp bed #206. As this bed is currently closed, this action is unlikely to impact kelp harvest activity unless the bed is opened in the future. Thus, expanding the MPA will maintain the existing level of impact on kelp harvesting, without adding any new restrictions.

⁸ [MPA Decadal Management Review Report: Prioritized Recommendations](#)

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 proposed northward expansion of the Point Buchon SMR boundary abuts land owned by PG&E at the Diablo Canyon Power Plant. Shoreline access is limited in this area and any management activities and/or changes to the MPA regulations may need to be coordinated with PG&E.

These interagency considerations are in alignment with the Marine Managed Areas Improvement Act (Pub. Resources Code §§ 36601, 36800). 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 management information to proceed with the evaluation of this proposed change. When evaluating this petition, CDFW reviewed the information in the petition as well as information including but not limited to:

- MLPA planning documents and related information (e.g., MLPA Goals and MPA Master Plan adaptive management objectives, MLPAI 2006),
- PG&E Point Buchon Trail Rules and Regulations (PG&E 2025),
- CDFW MED Data (Table 1), and
- Community Compliance Forum Reports (MPACN 2020).

CFGC will need to confirm whether the original Factual Record(s) of Current and Historical Uses previously submitted by SYBCI to CFGC for Naples SMCA, Kashtayit SMCA, Point Dume SMCA, and Anacapa Island SMCA include(s) the area contained within the proposed Point Buchon SMCA. If the previously submitted Factual Record of Current and Historical Uses does not include Point Buchon, SYBCI will need to provide this to CFGC for review, consistent with prior considerations for tribal take exemptions.

The information in the petition and other information reviewed by CDFW did not demonstrate relevance of the proposed change to MPA adaptive management or that a change to the MPA regulations is warranted. See Question 5 of Attachment 1 for significant information gaps.

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

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

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

No. During the MLPA Initiative planning process, alternatives to the adopted configuration included a truncated version of the SMR with an SMCA to the south and to the west, a variation where the northern boundary extended beyond Point Buchon to the north (package 2R), and an offshore SMCA and onshore SMR cluster (package 3R), a variation of which was adopted (with a slightly different boundary between the SMCA and SMR than that proposed in package 3R).

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 available that would warrant reevaluation of the proposed change.

QUESTION 8: IF THE PROPOSED CHANGE AFFECTS AN EXISTING MPA, DOES THE PROPOSED CHANGE ALIGN WITH THE ORIGINAL INTENT OF THE MPA IDENTIFIED DURING THE MLPA INITIATIVE PLANNING PROCESS OR THE IMPLEMENTATION PROCESS OF MPAS AROUND THE NORTHERN CHANNEL ISLANDS?

No. The Point Buchon SMCA and adjacent Point Buchon SMR were designed as an MPA cluster to provide a High Level of Protection (LOP) in both MPAs. Together, these MPAs were intended to meet the Goals of the MLPA while providing offshore recreational and commercial fishing for albacore and salmon. The proposed northern boundary change would not align with the original intent of the MPA's boundary design. The proximity to the Diablo Canyon Power Plant was taken into consideration during the planning process and the boundary was explicitly placed to "minimize negative socio-economic impacts to the fishing community in the Morro Bay/Port San Luis area, to the extent possible, by creating a state marine reserve in an area already closed to all fishing due to national security considerations" (MLPAI 2006). Expanding the boundary north could also infringe on the fishing grounds to the north, negating the intention specified during the planning process and ultimate adoption of the boundaries by CFGC (CFGC 2006).

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 MPA Network be based on the best readily available science and that MPAs be of adequate size, number, protection level, and location to meet MLPA Goals. The Science Guidelines developed by the SAT and outlined in the Master Plan were created specifically to provide this scientific foundation and serve as the starting point for evaluating alternative MPA proposals. Alignment with SAT Science Guidelines established during the MLPA Initiative planning process 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 (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 SAT Science Guidelines and additional context.

Point Buchon SMR, together with neighboring Point Buchon SMCA, meets both minimum criteria for size (18.87 square miles as an MPA cluster) and spacing (32.97 miles from the Piedras Blancas MPA cluster to the north and 32.5 miles away from the Vandenberg SMR to the south) and thus, contributes to foundational ecological MPA Network objectives, including replication and representation of kelp, beach, rocky intertidal, hard bottom (0-30 and 30-100 m depth zones), and soft bottom (30-100 m depth zone) habitats. Each of these habitats fall within the recommended maximum spacing of 62 miles from the nearest replicate.

Shifting the SMR boundary 350 feet to the north to align with Point Buchon would add additional area to the SMR (0.26 square miles), as well as to each of the existing replicated habitats (Table 2). This change would provide minor improvements to the design of the individual MPA but would not advance additional MPA Network-scale ecological objectives beyond what is currently provided. Implementation of the proposed change may add a small amount of area to the SMR, but not enough to meaningfully improve the ecological function of the individual Point Buchon SMR or the MPA Network and would not further enhance alignment with the SAT Science Guidelines established during the MLPA Initiative planning process.

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

No. The proposed change to extend the SMR boundary north would not align with the Feasibility Guideline pertaining to MPA Boundaries and Design Considerations. Point Buchon SMCA and SMR comprise an MPA cluster, and when considered together, a change to the SMR boundary (without a corresponding change to the SMCA boundary)

would be more difficult to determine in navigation and would create an L-shaped cluster. This configuration would be confusing to the public and difficult to enforce and is explicitly discouraged by the Feasibility Guidelines.

Although the petition raises compliance concerns, these do not appear related to public confusion around the boundary design (see Question 11 for information on enforceability). Additionally, there is a tall flagpole on land at the point that currently serves as a clear land-based marker for both shore-based and boat-based users.

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 information that has emerged since implementation of the MPA Network to support the proposed change.

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

No. Moving the boundary 350 feet north to align with Point Buchon would not result in improved alignment with CDFW Feasibility Guidelines and thus, would not enhance enforceability. Currently, there is an easily recognizable landmark visible from shore that corresponds with the existing line of latitude for the northern boundary of Point Buchon SMR in the MPA regulations. The northern boundary of Point Buchon SMR also aligns with the northern boundary for the offshore Point Buchon SMCA boundary. The proposed change would result in the northern boundaries of the two MPAs being offset, which does not align with Feasibility Guidelines, creating potential for public confusion and enforcement challenges. Successful enforcement would require extensive public outreach and education to inform the public of the new boundaries.

The regulatory compliance concerns raised in the petition likely pertain to reports from the MPACN Community Compliance Report for San Luis Obispo County that listed Point Buchon SMR and SMCA as the most common poaching spots in the county (MPACN 2020). The report states that, "Some boats tuck in close to the coast to fish in the SMR where they feel like they cannot be observed and at Disney Point." This area is within the SMR, downcoast of its northern boundary. Available enforcement data from 2016-2025 indicate improving trends since 2022, dropping from 30 citations in the SMR in 2022 to just 2 in 2025 (Table 1). MED confirmed a period of low compliance in the Point Buchon SMR/SMCA complex in 2022 following an emergency action that reduced rockfish bag limits. An uptick in compliance issues is not uncommon after regulatory changes are

enacted. MED attributes the improved compliance after 2022 to additional outreach and education efforts and well as enforcement presence.

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

No. The proposed change to the boundary of Point Buchon SMR is not intended to simplify the regulatory language and would not enhance public understanding without changing the intent of the MPA. In fact, the proposed boundary change has potential to introduce confusion.

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

Yes. The proposed change would add 0.26 square miles to the current 6.68 square mile area of the SMR (Table 2). However, Point Buchon SMR, together with Point Buchon SMCA, already meets the SAT Science Guidelines established during the MLPA Initiative planning process for habitat replication of a variety of habitats including sandy beach, rocky intertidal, offshore pinnacles, and hard and soft benthic habitats. The subsequent increases in the areas of each habitat would be negligible, depending on the habitat (Table 2). While the proposed change could maintain or enhance protection of marine resources by adding ~350 feet of shoreline, it is not enough to meaningfully improve protections beyond what the existing MPA currently provides. Additionally, PG&E does not allow fishing from shore along this portion of coast (PG&E 2025). The area at the point contains steep, rocky cliffs and is difficult to access from land. The waters near the point are also difficult to fish by boat due to the many rocky outcrops and heavy wave action.

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. Expanding the SMR north by 350 feet would remove 0.26 square miles of area where fishing is currently allowed.

Point Buchon SMR is a key long-term monitoring site for several habitats surveyed by the MPA Monitoring Program. The Multi-Agency Rocky Intertidal Network, Partnership for Interdisciplinary Studies of Coastal Oceans, and Marine Applied Research & Exploration survey the rocky intertidal, kelp forest, and deep reef, respectively. Additionally, the

California Collaborative Fisheries Research Program conducts hook-and-line catch-and-release surveys of nearshore groundfish⁹ in MPAs and nearby reference areas. Some of these groups have conducted monitoring surveys in the Point Buchon SMR for decades, even predating the MLPA. Expanding the northern boundary of the SMR may overlap with some of the monitoring reference sites and could interfere with one of the longest data time series in the MPA Network. Consistent monitoring of each key habitat has occurred since at least 2007, when the Central Coast MPAs were implemented. Such overlap has potential to compromise baseline tracking and interfere with the ability to effectively evaluate the long-term ecological performance of the SMR. The data described here represents a single analysis of potential impacts on the area. The full extent of socioeconomic impacts in this area, including any impacts on consumptive activities such as fisheries, is unknown (see Question 5 in Attachment 1 for significant information gaps).

The area also provides many opportunities for human connection with the ocean through non-consumptive activities such as wildlife viewing. Understanding how people interact with and derive benefits from the ocean and how these benefits may be affected by MPAs is challenging (Hall-Arber et al. 2021, CDFW 2022, Travis et al. 2026). Social science research within the MPA Monitoring Program is a rapidly expanding field of MPA research, as well as a priority DMR Recommendation to invest in improving understanding of the human dimensions of MPAs and develop a human dimensions working group and research agenda (DMR Recommendation 12).

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

⁹ For a list of all nearshore groundfish, see the California Nearshore Fishery Management Plan (CDFW 2002). Representative nearshore groundfish from the surrounding area of the proposed new MPA include cabezon, *Scorpaenichthys marmoratus*; California scorpionfish, *Scorpaena guttata*; California sheephead, *Bodianus pulcher*; black rockfish, *Sebastes melanops*; black-and-yellow rockfish, *S. chrysomelas*; blue rockfish, *S. mystinus*; brown rockfish, *S. auriculatus*; calico rockfish, *S. dalli*; China rockfish, *S. nebulosus*; copper rockfish, *S. caurinus*; gopher rockfish, *S. carnatus*; grass rockfish, *S. rastrelliger*; kelp rockfish, *S. atrovirens*; olive rockfish, *S. serranoides*; quillback rockfish, *S. maliger*; treefish, *S. serriceps*; kelp greenling, *Hexagrammos decagrammus*; rock greenling, *H. lagocephalus*; and monkeyface prickleback, *Cebidichthys violaceus*.

access, particularly for fishing participants associated with the coastal fishing communities of:

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

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

Yes. Petition 2023-34MPA proposes turning the SMCA into an SMR, which would effectively merge the two MPAs' boundaries.

V. SUPPLEMENTAL ANALYSES, DATA AND INFORMATION, AND CITATIONS

TABLES AND FIGURES

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

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

Table 2. MPA attributes (area, Level of Protection, depth range, and habitat extent) of the existing Point Buchon SMCA and Point Buchon SMR with the boundary adjusted as proposed in petition 2023-MPA20_2_AMI, including the percent change associated with the boundary change proposed in 2023-20MPA_2_AMI. Habitat extent may be reported in linear miles or square miles, depending on data availability and Science Advisory Team guidance. A dash () indicates that the MPA does not contain the habitat type. Percent change is calculated by dividing the difference between proposed and existing values by the existing value and multiplying by 100. Percent change is reported as N/A when the calculation is not possible, such as when the existing MPA does not contain the habitat type or when existing and proposed values are reported in different units.

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 square miles) and Level of Protection (Very High, High, or Moderate-high) criteria (i.e., first two rows must be bold). Point Buchon SMR meets those requirements when clustered with Point Buchon SMCA.

	SMR Existing	SMR Proposed	SMCA Existing	Cluster Existing	Cluster Proposed	SMR Change (%)
Area (sq mi)	6.68	6.94	12.19	18.87	19.13	4
Level of Protection	Very High	Very High	High	≥High	≥High	—
Min Depth (m)	0	0	58.5	0	0	—
Max Depth (m)	67.7	68.2	120.1	120.1	120.1	—
Eelgrass (sq mi)	—	—	—	—	—	—
Kelp (mi)	3.00	3.04	—	3.00	3.04	1
Beach (mi)	1.46	1.52	—	1.46	1.52	4
Rocky Intertidal (mi)	2.71	3.05	—	2.71	3.05	13
Estuaries (sq mi)	—	—	—	—	—	—
Hard Substrate						
0-30 m (mi)	2.72	2.86	—	2.72	2.86	5
30-100 m (sq mi)	0.47	0.52	0.29	0.76	0.81	11
100-200 m (sq mi)	—	—	0.05	0.05	0.05	—
>200 m (sq mi)	—	—	—	—	—	—
Soft Substrate						
0-30 m (mi)	0.36	0.36	—	0.36	0.36	0
30-100 m (sq mi)	4.46	4.57	8.13	12.6	12.7	2
100-200 m (sq mi)	—	—	3.25	3.25	3.25	—
>200 m (sq mi)	—	—	—	—	—	—

CITATIONS

Armitage D.R., R. Plummer, F. Berkes, R.I. Arthur, A.T. Charles, I.J. Davidson-Hunt, A.P. Diduck, N.C. Doubleday, D.S. Johnson, M. Marschke, P. McConney, E.W. Pinkerton, E.K. Wollenberg. 2009. Adaptive co-management for social-ecological complexity. *Frontiers in Ecology and the Environment*. 7(2).

Artelle K.A., M. Zurba, J. Bhattacharyya, D.E. Chan, K. Brown, J. Housty, F. Moola. 2019. Supporting resurgent Indigenous-led governance: A nascent mechanism for just and effective conservation. *Biological Conservation* 240.

Ban N.C., A. Frid, M. Reid, B. Edgar, D. Shaw, P. Siwallace. 2018. Incorporate Indigenous perspectives for impactful research and effective management. *Nature Ecology and Evolution* 2(11).

Berkes F. 2009. Evolution of co-management: Role of knowledge generation, bridging organizations and social learning. *Journal of Environmental Management* 90(5).

California Department of Fish and Wildlife (CDFW). 2002. Nearshore Fishery Management Plan. CDFW, Sacramento, CA. California Department of Fish and Wildlife. 2016. California Marine Life Protection Act Master Plan for Marine Protected Areas.

California Department of Fish and Wildlife (CDFW). 2022. California's Marine Protected Area Network Decadal Management Review.

California Marine Life Protection Act Initiative (MLPAI). 2006. Summary Matrix of MPAs, Goals and Objectives, and Species Likely to Benefit in Package 2R, March 15, 2006.

California Fish and Game Commission (CFGCC). 2006. Final Statement of Reasons for Regulatory Action: Amend Sections 165 and 632 Title 14, California Code of Regulations Re: Marine Protected Areas.

California Fish and Game Commission (CFGCC). 2011. Initial Statement of Reasons for Regulatory Action: Amend Section 632, Title 14, California Code of Regulations Re: Marine Protected Areas.

California Fish and Game Commission (CFGCC). 2012. Final Statement of Reasons for Regulatory Action: Amend Section 632, Title 14, California Code of Regulations Re: Marine Protected Areas.

California Fish and Game Commission (CFGCC). 2020. [California Fish and Game Commission Co-Management Vision Statement and Definition](#), February 2020.

California Fish and Game Commission (CFGF). 2021. Finding of Emergency and Statement of Proposed Emergency Regulatory Action to Amend Section 28.55, Title 14, California Code of Regulations Re: Recreational Sub-Bag Limits for Vermilion, Copper, and Quillback Rockfishes.

California Fish and Game Commission (CFGF). 2022. Initial Statement of Reasons for Regulatory Action: Amend Sections 1.91, 27.20, 27.25, 27.30, 27.35, 27.40, 27.45, 27.50, 27.51, 28.26, 28.27, 28.28, 28.29, 28.47, 28.48, 28.49, 28.54, 28.55, 28.56, 28.58, 28.65 and 28.90, Title 14, California Code of Regulations Re: Recreational Fishing Regulations for Federal Groundfish and Associated Species for 2023 and 2024.

Glassow, M. 1995. Purisimeno Chumash Prehistory: Maritime Adaptations Along the Southern California Coast (Case Studies in Archaeology. Wadsworth Publishing; 1st edition (November 17)

Hall-Arber, M., S. Murray, L. Aylesworth, M. Carr, J. Field, K. Grorud-Colvert, R. Martone, K. Nickols, E. Saarman, S. Wertz. 2021. Scientific Guidance for California's MPA Decadal Reviews: A Report by the Ocean Protection Council Science Advisory Team Working Group and California Ocean Science Trust.

McGinnis, M.V. 2024. Co-Management of California-Chumash Marine Conservation Area: a White Paper Produced for The Santa Ynez Band of Chumash Indians.

[DOI:10.13140/RG.2.2.30898.21447](https://doi.org/10.13140/RG.2.2.30898.21447)

McLendon, S., J.R. Johnson. 1999. Cultural Affiliation and Lineal Descent of Chumash Peoples in the Channel Islands and the Santa Monica Mountains. Report prepared for the National Park Service. [Available via the National Park Service online library](#), accessed May 15, 2026.

Marine Protected Area Collaborative Network (MPACN). 2020. Marine Protected Area (MPA) Community Compliance Forum Report November 5, 2020. San Luis Obispo MPA Collaborative. <https://www.mpacollaborative.org/wp-content/uploads/2021/03/San-Luis-Obispo-Compliance-Forum-Report-Final-Reduced-1.pdf>.

Murray, MJ. 2023. Tribal Co-management of federal lands: Overview and selected issues for Congress. Report No. R47563. Congressional Research Service, Washington D.C.

[Pacific Gas & Electric. N.D. Point Buchon Trail Rules and Regulations](#) accessed November 1, 2025.

Travis, K., M. Zulian, J.L. Harris, C. Allison, N. Ban, A. Canter, P. Christie, G. Crowe, Coach Jackson, K. Kessler-Mata, P. King, S. Klain, A. Levine, R. Meyer, D. Pietri, A. Quintana, J. Selgrath, K. Shaffer, T. Swearingen. 2026. Recommendations for Social Science Research

July 2026

and Monitoring of the California Marine Protected Area Network. California Ocean Science Trust.

Warrior M., L. Fanning, A. Metaxas. 2022. Indigenous peoples and marine protected area governance: a Mi'kmaq and Atlantic Canada case study. FACETS 7.