Introduction to Bin 2 MPA Regulation Change Petitions and Evaluations

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

Consider evaluations, recommendations, and public comments in determining whether to grant or deny 15 pending bin 2 MPA petitions for regulation change. Petitions or individual actions within petitions that are granted today will be added to the Commission's rulemaking calendar for development and future consideration in a rulemaking.

This staff summary provides an overview and background relevant to the 15 petitions and actions listed under Agenda Items 26-39.

Summary of Previous/Future Actions

• Received 20 MPA petitions; referred to Marine Resources Committee (MRC) and Department for review and recommendation	December 2023 and February 2024
• Approved MRC recommendation for sorting MPA petitions and evaluating individual actions within "binned" petitions, and supported scheduling consideration of individual actions as recommendations were ready	August 2024
• MRC received Department recommendations for individual actions proposed in 5 "bin 1" MPA petitions and developed MRC recommendations; recommendations adopted by Commission	November 2024; MRC and December 2024
• Petitioners for the 15 "bin 2" petitions afforded an opportunity to amend petitions	December 2024 – March 2025
• MRC received Department proposal for bin 2 petition evaluation framework and developed recommendations for grouping the 15 MPA petitions in bin 2 for future review and discussion	July 16-17, 2025; MRC
• Received and approved MRC recommendation for bin 2 petition evaluation framework, with one modification to add a question about tribal leadership/sponsorship	August 13-14, 2025
• Tribal Committee (TC) received overview with any revisions from tribal leads or co-leads of 5 MPA petitions; received Department presentation, and developed TC recommendation	April 14, 2026; TC
• Approved TC recommendation for Department to evaluate 5 *revised* tribally led or co-led petitions as proposed on April 14*;* received Department bin 2 petition evaluations for 10 non-tribally led or co-led petitions	April 15-16, 2026
• At San Mateo, Goleta, and San Clemente regional MPA meetings, received petitioner presentations, asked	April 21, May 5–6, and May 19, 2026

clarifying questions, and received community inputs on region-specific petitioned actions	
• Received additional evaluations and recommendations: – Department bin 2 evaluations for five tribally led or co-led petitions, – Department and California Ocean Protection Council (OPC) Initial Assessment of Question 14 (Equitable Access) and Question 16 (Commission Justice, Equity, Diversity and Inclusion (JEDI) Policy) of the 2025 MPA Petition Evaluation Framework, – OPC Policy Evaluation and Recommendations	August 12-13, 2026
• **Today, potentially act on individual regulation change proposals and non-regulatory requests**	**October 13-16, 2026**

Background

In 1999, California began a new era of ocean management with the passage of the Marine Life Protection Act (MLPA) and, the following year, the Marine Managed Areas Improvement Act; together these laws led to the redesign of a series of small, unconnected protected areas along the coast, and the establishment of today's statewide network of 124 MPAs covering approximately 16% of the state's marine waters. The network was designed through a science-based planning process that included fishermen, divers, environmental organizations, tribes, agency representatives, academics, and many others over more than a decade.

Along with designating MPAs, the Commission adopted a master plan that guides implementation of a Marine Life Protection Program to improve the design and management of California's MPAs, to the extent possible, as a network. The current master plan was adopted in 2016; one of the plan's requirements is that the Department conduct a review of the MPA network every ten years to inform the adaptive management process, which is at the core of the management program. The first decadal management review (DMR) concluded in February 2023 when the Department presented its findings and recommendations to the Commission, with a focus on the four pillars of the management program — Outreach & Education, Research & Monitoring, Enforcement & Compliance, and Policy & Permitting — and corresponding evaluations of progress toward the goals of the MLPA, a summary of the knowledge gaps and opportunities, a framework for translating performance evaluation results and knowledge gaps into management recommendations, and 28 adaptive management recommendations.

The DMR recommendations were focused around 11 key elements, with one recommendation to apply what was learned from the first DMR to support proposed changes to the MPA network and management program. The DMR process generated significant public interest in contributing to adaptive management of the network, including through public proposals to modify existing MPAs or management approaches. In response, the Commission agreed to accept public proposals using its existing process for public petitions for regulation change. The Commission set a submission deadline for late November 2023 for receipt at the December 2023 Commission meeting. The Commission received 20 petitions that November, proposing modifications to MPAs, to establish new MPAs, or to modify elements of the

management program. By late 2024, the Commission acted on five of the petitions — categorized as "bin 1" for near-term evaluation — leaving 15 "bin 2" petitions for additional evaluation under a bin 2 evaluation framework approved by the Commission.

Petition Amendments

After submitting their original petitions, Bin 2 petitioners were provided an opportunity until March 2025 to submit formal amendments to their petitions, to be integrated into evaluations that would be conducted by the Department.

For tribally led or co-led petitions, the Commission provided additional time for the Department to consult with tribes and for California tribes to formally join petitions as co-sponsors. The Commission also requested that tribally led or co-led petitions be discussed at the April 14, 2026 Tribal Committee meeting in which tribal petitioners were given an opportunity to amend their petitions. At the following Commission meeting, the Commission approved the Tribal Committee's recommendation to accept the amendments.

After the March 2025 deadline for non-tribally led petitions, several petitioners have identified additional requested changes for the Commission's awareness, noting these revisions respond to community concerns or, in one case, input from the U.S. Department of Defense. However, the Commission supported the Department's and staff's request to not incorporate additional, informal, post-deadline amendments into the evaluation process since the Department was already beginning reviews and evaluations and did not have capacity to conduct them multiple times. Instead, petitioners were asked to describe any proposed changes not reflected in their original or amended petitions during regional MPA petition meetings, scheduled for after Department evaluations were released. The additional proposed amendments by petitioners may be considered during this meeting at the Commission's discretion.

Department Evaluations and Recommendations for Ten Non-Tribally Led or Co-Led Petitions

On March 20, 2026, the Department released its evaluations and recommendations for 10 of the 15 petitions — those not led or co-led by tribes or tribal communities. The Department's evaluations were developed using the bins 2 evaluation framework and informed, in part, by Commission staff's work on two of the evaluation framework questions. The materials released included a Department transmittal memo (Exhibit 1), a petition evaluation companion document with supplemental information and additional context across the petition evaluations (Exhibit 2), and petition-specific analyses (see exhibits for staff summaries 26-39). The documents generated considerable public interest, with numerous, substantive comment letters received in advance of the Commission's April 15-16, 2026 meeting.

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

Regional Meetings

The Department's evaluation and recommendation presentation for the non-tribally led or co-led petitions, TC discussion and input on tribally led and co-led petitions, and public input on both helped lay the foundation for robust public dialogue at the regional scale in three public meetings. The Commission commenced the three regional meetings in April and May of 2026 to hear directly from petitioners and the public on all 15 bin 2 MPA petitions.

During the meetings, the Commission received presentations from all the petitioners and comments from tribal representatives and members, elected officials, California residents from local coastal communities, non-governmental organizations, groups representing commercial and recreational fishing interests, students, and other members of the public. Across the three regional meetings, more than 700 participants attended in person and over 1,200 participated via Zoom or by phone. In addition, hundreds of letters and thousands of email messages were received that expressed a wide array of perspectives on the petitions. All of the contributions from participants will help inform the Commission's decisions during this meeting.

Additional information about the regional meetings is available on the Commission's website, including regional MPA meeting agendas and materials and regional meeting goals and participation guidelines.

Department Evaluations and Recommendations for Five Tribally Led or Co-Led Petitions

Consistent with the Commission's request, the Department attended the April 14, 2026 Tribal Committee meeting to hear presentations from tribal leads and co-leads and to seek guidance before completing its evaluations. The tribal leads and co-leads of the five petitions shared their goals, updates, clarifications, and any desired revisions to the original petitions. Participants and the committee discussed recommending that the Department proceed with evaluating the five tribally led or co-led petitions as described during the meeting. At its April 15-16, 2026 meeting, the Commission adopted the recommendation to formally accept clarifications and revisions to three of the tribally-led or co-led petitions and requested of the Department that it proceed with evaluating the petitions with the revisions incorporated.

On May 29, Commission staff transmitted to the Department a memo formally documenting the revisions to the tribal petition actions (Exhibit 4). The memo includes a table outlining the original and revised actions proposed in the petitions and assigns an updated petition number with an "AM" to indicate a formal amendment. The memo was subsequently revised on July 6 with revisions to the original memo shown in blue text. The July 6 version reflects the proposed actions evaluated by the Department. For transparency, the memo has also been attached to the five individual petitions available online in the bin 2 MPA petition index.

On July 30, 2026, the Department transmitted its evaluations and recommendations for the five tribally led and co-led MPA petitions to the Commission (Exhibit 5) and revised the companion document to the evaluations to integrate supporting information for tribally led or co-led MPA petition evaluations. The Commission received a presentation at its August 13-14, 2026 meeting from the Department of its evaluations and recommendations for the five tribally led or co-led MPA petitions (see Exhibit 6 for presentation slides). The recording of the Department's presentation and public/Commission discussion is available online.

Department Science Guide to California's MPA Network

In addition, in late July the Department released a document with the science foundation of the MPA network and design outcomes. The document provides an overview of the scientific guidelines used during the MLPA Initiative planning process to design California's MPA network, the utility of the guidelines in informing adaptive management and evaluation of MPAs today, and an analysis of the existing MPA network's conformance to the scientific guidelines using the most recent habitat data available. The guide is designed as a living document, intended to be updated periodically to reflect the best available science.

California Ocean Protection Council (OPC) Evaluations and Recommendations

In addition to the Department's evaluations, the executive director of OPC, on behalf of OPC Chair and Secretary for Natural Resources Wade Crowfoot, submitted a letter to the Commission in April 2026 (Exhibit 7) providing input on proposals to adaptively manage California's MPA network, with the stated intent to complement the Department's evaluations. The letter highlights OPC's unique policy role in California's MPA network, supporting adaptive management, using MPAs to protect full ecosystems, prioritizing tribal stewardship, and supporting thriving fishing communities and climate-resilient fisheries. As such, OPC has engaged in the petition evaluation process and attended all Commission meetings in 2026 where MPA petitions were discussed.

On July 31, 2026, OPC staff completed and transmitted to the Commission its evaluations and recommendations for the bin 2 MPA petitions (Exhibit 8). The OPC recommendations are rooted in a precautionary approach, considering threats to the coast and MPAs brought about by climate change and the benefits provided by coastal ecosystems to coastal communities and tribes. At its August 2026 meeting, the Commission received a presentation from OPC's executive director, which provided an overview of the petitions review and recommendations, including steps taken to reach the overall recommendations (see Exhibit 9 for presentation slides). The recording of OPC's presentation and public/Commission discussion is available online.

Input on Equitable Access and the Commission's Justice, Equity, Diversity, and Inclusion (JEDI) Policy from the Department and OPC

The April 2026 evaluations did not include individual petition responses to questions 14 (equitable access) and 16 (Commission JEDI policy) of the MPA petition evaluation framework; instead, the companion document included an overarching statement regarding each question, and the reason individual petition assessments were not provided. During Commission meetings conducted in April and May 2026, members of the public and interested groups called for a more substantial assessment to questions 14 and 16. The Commission was responsive to the concerns and requested that, to the extent possible, the analyses be reassessed and provided as companion assessments in August 2026.

An additional, more detailed assessment for questions 14 and 16 was completed through a collaborative effort between Department, OPC, and California Natural Resources Agency staff who jointly transmitted their initial assessment to the Commission (exhibits 10-11). The initial assessment includes an inventory that can aid the understanding of how proposed petition actions may impact equitable access to the coast and MPAs, and evaluates the petitions through

the JEDI policy lens; it also acknowledges past harms and exclusions as well as discusses future opportunities to improve tribal and community engagement.

The Commission received a presentation by the Department on the collaborative process and initial assessment in addressing questions 14 and 16 (see Exhibit 12 for presentation slides). The recording of the Department's presentation and public/Commission discussion is available online.

Today's Meeting

The Commission will consider evaluations, recommendations, and public comments in determining whether to grant or deny the 15 bin 2 MPA petitions and actions associated with each petition. Since the regional meetings, the Commission has continued to receive public input through written comments submitted to the Commission or verbal comments at the June and August 2026 Commission meetings.

For petition-specific information, comments, Department evaluation and recommendations, and OPC evaluation and recommendations, see individual exhibits listed in each MPA petition staff summary for today's meeting.

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

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

Significant Public Comments

Nearly 450 letters and emails were received for the October Commission meeting by the regular comment deadline, some of which are not specific to any one MPA petition; examples include comments about the petition process, broad support for specific goals, appropriate scientific review and guidance, the MPA network, or supporting other agencies' recommendations.

Exhibits

1. Department memo transmitting evaluations for ten bin 2 non-tribally led or co-led MPA petitions, received March 20, 2026
2. Department "2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document" for MPA petition evaluations, dated July 30, 2026
3. Department presentation of evaluations for ten non-tribally led MPA petitions, from Agenda Item 2, April 15-16, 2026 Commission meeting
4. Commission memo to the Department regarding descriptions of actions proposed for tribally led and co-led MPA petitions, dated May 29, 2026 and updated July 6, 2026

5. Department memo transmitting evaluations for five bin 2 tribally led or co-led MPA petitions, received July 30, 2026
6. Department "Science Guide to California's MPA Network," dated July 2026
7. Department presentation of evaluations for five tribally led or co-led MPA petitions, from Agenda Item 7A, August 12-13, 2026 Commission meeting
8. Letter from Jenn Eckerle, Executive Director, California Ocean Protection Council (OPC), and Deputy Secretary for Oceans, California Natural Resources Agency (CNRA), received March 20, 2026
9. Letter from Jenn Eckerle, Executive Director, OPC, and Deputy Secretary for Oceans and Coastal Policy, CNRA, with OPC staff recommendations and narratives for petitions to adaptively manage California's MPA network, received July 31, 2026
10. OPC presentation for all 15 bin 2 MPA petitions, from Agenda Item 7C, August 12-13, 2026 Commission meeting
11. Department memo transmitting initial assessment of bin 2 petitions to address questions 14 and 16 related to equitable access and advancing the Commission's JEDI Policy, received July 31, 2026
12. Department/OPC staff Initial Assessment of Q14 and Q16 of the 2025 MPA petition evaluation framework
13. Department presentation of Initial Assessment from Agenda Item 7B, August 12-13, 2026 Commission meeting
14. Compilation of general comments submitted by 5:00 p.m. on September 30, 2026

Motion (N/A)

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

MEMORANDUM

Date: March 20, 2026

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

From: Craig Shuman
Marine Regional Manager

Subject: CDFW 2023 MPA Bin 2 Petition Evaluations for the Ten Non-Tribally-led Petitions

At its February 14-15, 2024, meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to the California Department of Fish and Wildlife (CDFW) for review, evaluation, and recommendation. Throughout 2024, CDFW implemented a 3-phased approach to evaluate MPA petitions which was supported by the Marine Resources Committee (MRC) and approved by CFGC in April 2024. The MRC considered CDFW's recommendations on 5 petitions (Bin 1) at the November 6-7, 2024, MRC meeting and CFGC adopted the recommendations at the December 11-12, 2024, CFGC meeting.

At the March 13, 2025, MRC meeting, CDFW presented the proposed timeline and process for the remaining 15 petitions (Bin 2). This included the development of an evaluation framework for the Bin 2 petitions and sorting the petitions into groups to facilitate subsequent petition discussions. CFGC approved the proposed timeline and process at their April 16-17, 2025, meeting. CDFW, with support from staff at CFGC and the Ocean Protection Council, developed the draft 2023 MPA Bin 2 Petition Evaluation Framework for the MRC's consideration at the July 16-17, 2025, meeting, which was approved by CFGC at their August 2025 meeting with minor modifications. CDFW has completed the Evaluations and Recommendations for the ten non-Tribally-led petitions (Attachments 2-11) as listed below. CDFW's recommendations on the ten non-Tribally-led petitions are based on petitions and amendments received as of March 2025. **Additional changes, amendments and interested party engagements completed by petitioners after that date have not been considered as part of the evaluation and recommendations.** CDFW recognizes that new information on these petitions may be available for CFGC consideration.

- **2023-14MPA:** Modify take in 9 SMCAs to Allow Commercial Take of Sea Urchins
- **2023-15MPA-AM:** Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species
- **2023-16MPA:** Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling
- **2023-18MPA:** Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures
- **2023-23MPA-AM:** Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests
- **2023-24MPA-AM:** Expand Boundaries of Laguna Beach No-take SMCA
- **2023-27MPA-AM:** Amend Existing Anacapa Island SMCA or Special Closure to Protect Eelgrass
- **2023-32MPA:** Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries
- **2023-33MPA-AM:** Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Island SMRs, Point Dume SMCA, and Add a New SMCA at Pleasure Point
- **2023-34MPA:** Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

CDFW also prepared a 2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document (Companion Document; Attachment 1). The Companion Document should be read in advance of the petition evaluations as it includes supplemental information and additional context that is relevant for all the evaluations. The Companion Document includes a summary of CDFW's outreach to California Native American tribes and engagement with Tribally-led petitioners. CDFW plans to provide an update on the Tribally-led petitions at the Tribal Committee meeting on April 14, 2026.

If you have any questions or need more information, please contact me at r7regionalmgr@wildlife.ca.gov.

Attachment 1: CDFW's 2023 Decadal Management Review Marine Protected Area Petition
Evaluation Companion Document

Attachment 2: CDFW Evaluation and Recommendations for **2023-14MPA**: Modify take in 9 SMCAs to Allow Commercial Take of Sea Urchins

Attachment 3: CDFW Evaluation and Recommendations for **2023-15MPA-AM**: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species

Attachment 4: CDFW Evaluation and Recommendations for **2023-16MPA:** Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling.

Attachment 5: CDFW Evaluation and Recommendations for **2023-18MPA:** Modify Allowed Uses at Several Santa Barbara Channel MPAs: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures

Attachment 6: CDFW Evaluation and Recommendations for **2023-23MPA-AM:** Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests

Attachment 7: CDFW Evaluation and Recommendations for **2023-24MPA-AM:** Expand Boundaries of Laguna Beach No-take SMCA

Attachment 8: CDFW Evaluation and Recommendations for **2023-27MPA-AM:** Amend existing Anacapa Island SMCA or Special Closure to Protect Eelgrass

Attachment 9: CDFW Evaluation and Recommendations for **2023-32MPA:** Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Attachment 10: CDFW Evaluation and Recommendations for **2023-33MPA-AM:** Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Island SMRs, Point Dume SMCA, and Add a New SMCA at Pleasure Point

Attachment 11: CDFW Evaluation and Recommendations for **2023-34MPA:** Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

ec: Meghan Hertel, Director
California Department of Fish and Wildlife

Chad Dibble, Deputy Director
Wildlife and Fisheries Division

Kevin Thomas, Deputy Director
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Nathaniel Arnold, Chief
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Office of General Counsel

Claire Waggoner, Marine Region Habitat
Conservation Program Manager
Marine Region

Erica Mason, Statewide Marine Protected Area
Management Project Supervisor
Marine Region

Jenn Eckerle, Deputy Secretary for Ocean and
Coastal Policy Natural Resources Agency

Attachment 1

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

COMPANION DOCUMENT



CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA MARINE PROTECTED AREAS

July 2026

This document is the 2023 Decadal Management Review Marine Protected Area Petition Evaluation Companion Document (Companion Document). The Companion Document and the California Department of Fish and Wildlife (CDFW) Transmittal Memo should be read in advance of the 2023 Bin 2 Petition Evaluations as it includes supplemental information and additional context for the evaluations.

The Companion Document was originally released March 20, 2026 along with CDFW's evaluations and recommendations for the ten Non-tribally-led Petitions. This July 2026 version of the Companion Document includes the following additions: a detailed timeline of the 2023 MPA Petition milestones, updates related to tribal outreach and engagement, a new section on Climate Resilience and MPAs, and additional supplemental information for Question 5 (information gaps) and Question 9 (MPA Network design and Levels of Protection (LOP)) of the evaluation.

INTRODUCTION

At its February 14-15, 2024, meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to CDFW for review, evaluation, and recommendation. These petitions were sorted into Bin 1 and Bin 2 Petitions. The Marine Resources Committee (MRC) considered CDFW's recommendations on 5 Bin 1 Petitions at the November 6-7, 2024 MRC meeting and CFGC adopted the MRC's recommendations at the December 11-12, 2024 CFGC meeting. See Table 1 for a comprehensive overview of process milestones for the 2023 MPA Petitions.

On August 14, 2025, CFGC approved an evaluation framework (Framework) for the 15 Bin 2 Petitions referred to CDFW proposing changes to the MPA Network. CDFW developed the Framework, with support from staff at CFGC and Ocean Protection Council, 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, Master Plan objectives, and Science Advisory Team (SAT) Science Guidelines established during the MLPA Initiative planning process as the primary basis for evaluating any action taken to make changes to the MPA Network. The 2016 Master Plan adaptive management process also includes consideration of emerging issues, such as changes to the MPA Network that would enhance climate resilience and/or help mitigate climate impacts. CDFW considered climate change effects throughout the evaluation, recognizing that the effects of climate change are overarching and climate resilience is an implicit goal of adaptive management of the MPA Network as a whole. The Framework also draws from the Decadal Management Review (DMR) and Recommendations, and the MPA Regulation Change Petition Framework approved by CFGC at their August 2023 meeting, which is rooted in the DMR Recommendation cornerstones of MPA Governance, MPA Management Program Activities, and MPA Network Performance.

The Framework includes the following sections:

I. Petition Summary
II. CDFW Recommendations with Brief Justifications
III. Bin 2 Petition Grouping: Identify Tribally-led Petitions
IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation
V. Supplemental Analyses, Data and Information, and Citations

CDFW used the Framework to transparently evaluate petitions and develop recommendations to CFGC for the 2023 MPA Bin 2 Petitions. The evaluations were based on materials submitted in December 2023 and amendments received through March 2025. Subsequent changes, improvements, or stakeholder engagement undertaken by petitioners after March 2025 were not considered. CDFW recognizes that new information on these petitions may be available for CFGC consideration.

The Bin 2 Petitions and petition actions vary in complexity, and the Framework is designed to address this spectrum of complexity. In some cases, it was more appropriate to evaluate Bin 2 Petitions as a whole and in other cases, it was more appropriate to evaluate the individual proposed actions or grouped proposed actions that were similar within a petition. Not all evaluation components in Section IV applied to every proposed action or petition as they were not all relevant to each proposed action or petition. CDFW applied the evaluation components as appropriate, and the level of detail varied based on factors such as applicability of the question or information available. Non-regulatory requests were not evaluated through the Framework. For some petitions, CDFW recommended an alternative pathway to achieving the desired outcome of the proposed change.

The DMR indicated the MPA Network is meeting expectations and functioning effectively towards achieving the Goals of the MLPA. Therefore, significant regulatory changes to the MPA Network should meet a high threshold of demonstrated conservation value and need, as well as clear, science-supported benefit.

This evaluation is not the only process by which regulatory changes have been considered as part of the adaptive management of the MPA Network. Since implementation of California's MPA Network, targeted legislative and regulatory refinements have been identified to align MPAs with their original intent, clarify or correct provisions, or address priority management and enforcement issues. Since 2013, four legislative amendments and seven regulatory packages have been enacted to strengthen and support the adaptive management of the MPA Network and Management Program. The regulatory amendments:

- 2014 – Clarified and corrected provisions, including general provisions, definitions, take, and boundaries
- 2015 – Clarified and corrected provisions, including general provisions, definitions, take, and boundaries. This includes refining and correcting boundary coordinates for 106 MPAs
- 2016 – Added provisions for tribal take in north coast MPAs
- 2018 – Repealed a special closure due to conflict with private property
- 2018 – Added provisions for tribal take in south coast MPAs and amended boundaries to better align with historical subsistence and cultural use
- 2022 – Cleaned up State Marine Recreational Management Area language
- 2023 – Provided a mechanism for operation and maintenance of pre-existing artificial structures in MPAs

The legislative amendments include Senate Bill 96 (2013), Assembly Bill 298 (2015), Assembly Bill 2369 (2018), and Assembly Bill 63 (2021). See Appendix G of the Decadal Management Review for more information about regulatory packages and legislative amendments that apply to MPA Network management implemented since 2012. All amendments were deliberately and carefully constructed, consistent with directives in the Fish and Game Code (§§2853 and 2855), MLPA, and the Master Plan for MPAs, to preserve the integrity of the MPA Network.

CDFW remains committed to adaptive management through regulatory and non-regulatory pathways and will continue to work with tribes and partners to advance the Recommendations of the DMR through a science-based, inclusive statewide process consistent with the requirements of the MLPA and Master Plan for MPAs.

Table 1. Summary of 2023 MPA Petition Process Milestones.

Date	Milestone
Aug 2023	California Fish and Game Commission (CFGC) approves DMR adaptive management recommendation prioritization framework and supported the Marine Resources Committee preference to consider changes to the MPA Network using the existing CFGC petition process
Oct 2023	CFGC releases "Overview of Process to Consider Potential Changes to California's MPA Network"
Dec 2023	CFGC receives 20 MPA-related petitions with 80+ actions
Feb 2024	CFGC refers all 20 petitions to CDFW for evaluation
Apr 2024	CFGC adopts 3-phased approach to petition evaluation

Date	Milestone
Aug 2024	CFGC approves binning petitions, requests CDFW evaluate the five Bin 1 Petitions and develop a proposed framework to evaluate 15 Bin 2 Petitions
Nov 2024	CDFW releases recommendations for five Bin 1 Petitions
Dec 2024	CFGC makes decisions on Bin 1 Petitions and establishes March 14, 2025 deadline for amendments to Bin 2 Petitions
Mar 14, 2025	Deadline for amendments to Bin 2 Petitions
Apr 2025	CFGC refers amended Bin 2 Petitions to CDFW for evaluation
Apr-May 2025	CDFW develops Draft Bin 2 Petition Evaluation Framework with Ocean Protection Council and CFGC staff
May 2025	Update and discussion at CFGC Tribal Committee (TC) meeting on Bin 2 MPA Petitions and proposed approach for evaluations
Aug 2025	Update and discussion on 2023 MPA Petitions and Draft Evaluation Framework at CFGC TC and CFGC. Four Tribally-led petitions identified and CFGC approves framework for evaluating Bin 2 MPA Petitions
Dec 2025	Update and discussion at CFGC TC on Bin 2 MPA Petitions; identifies one more Tribally-led petition; directs CDFW to return to April 2026 CFGC TC to discuss MPA Petitions prior to releasing evaluations for the Tribally-led petitions
Mar 20, 2026	CDFW releases evaluations and recommendations for the 64 proposed actions in the ten non-Tribally-led Bin 2 MPA Petitions and the Companion Document
Apr 2026	Update and discussion at CFGC TC on five Tribally-led petitions. CFGC accepts amendments to four of the Tribally-led petitions and refers them to CDFW for evaluation
Apr-May 2026	Regional CFGC meetings discussing Bin 2 MPA Petitions • April 21, 2026 in San Mateo, Del Norte through Monterey counties petitions • May 5-6, 2026 in Goleta, alongshore San Luis Obispo through Santa Barbara counties petitions (day 1) and Northern Channel Islands (day 2) • May 19, 2026 in San Clemente, Los Angeles through San Diego counties petitions, including Santa Catalina Island
July 2026	CDFW releases evaluations and recommendations for the 9 proposed actions in the five Tribally-led Bin 2 MPA Petitions and the revised Companion Document

SUPPLEMENTAL EVALUATION INFORMATION

CDFW compiled supplemental information and additional context for the Tribally-led etitions, the topic of climate resilience and MPAs, and the responses to Evaluation Questions 1, 2a, 5, 9, 10a, and 14, and Section V. Supplemental Analyses, Data and Information, and Citations. CFGC staff conducted the analysis and prepared the responses for Questions 16 and 17 and provided additional context for their evaluations below. The information provided here was common across the evaluations and is included here to prevent having to repeat it in each evaluation.

TRIBALLY-LED PETITIONS

This Companion Document includes a summary of the process for identifying Tribally-led petitions, CDFW's outreach to all California Native American tribes throughout the petitions process, and a summary of outreach and engagement with Tribally-led petitioners (Attachment A below). As directed by CFGC, CDFW evaluated the Tribally-led petitions with the CDFW 2023 MPA Bin 2 Petition Evaluation Framework. Tribally-led petitions, per CFGC direction, were discussed at the April 14, 2026, CFGC Tribal Committee meeting. *Note: California Native American tribe is the preferred term to use per the Governor's Office of Tribal Affairs when generally mentioning tribes of California, both federally and non-federally recognized.*

The following petitions were identified by CFGC as Tribally-led petitions:

- Santa Ynez Band of Chumash Indians: Designate a New Chitqawi SMCA Near Morro Bay with a Tribal Take Exemption for Santa Ynez Band of Chumash Indians (2023-19MPA_AM1)
- Santa Ynez Band of Chumash Indians: 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)
- Tolowa Dee-ni' Nation: Remove Recreational Take of True Smelt and Change the Boundary at Pyramid Point SMCA (2023-21MPA_AM1)
- Northern Chumash Tribal Council: Designate a New SMCA Near Point Sal with an Allowance for Recreational Take of Finfish by Hook-and-Line from Shore (2023-28MPA_AM2)
- Santa Ynez Band of Chumash Indians: Designate a New SMCA Near Mishopshno/ Carpinteria with an Allowance for Recreational Take of Finfish by Hook-and-Line From Shore and a Tribal Take Exemption for Santa Ynez Band of Chumash Indians (2023-29MPA_AM2)

Summary of Tribal Outreach and Engagement with California Native American Tribes for the 2023 MPA Petitions

In late 2023, CFGC received 20 petitions from California Native American tribes (tribes) and the public requesting changes to California's MPA Network. CFGC referred the 2023 MPA Petitions to CDFW to evaluate in early 2024. This document provides a summary of tribal outreach and engagement with California Native American tribes for the 20 2023 MPA Petitions, including five Tribally-led petitions, proposing approximately 70 changes to the MPA regulations for MPAs from southern California to the Oregon border (2023 MPA Petitions).

Summary of CDFW tribal outreach for all 2023 MPA petitions

Since receiving the petitions, CDFW has provided regular updates on the status of the 2023 MPA Petitions and petition evaluation process through email communications and mailed letters to the CDFW tribal contact list. The CDFW tribal contact list includes over 400 individuals across the state who represent and/or work for a California Native American tribe. The statewide list is maintained by CDFW's Tribal Liaison and includes people on the Native American Heritage Commission (NAHC) contact list and others who have elected to receive updates from CDFW related to tribes. These updates included offers for consultation and meetings between tribes and CDFW. In October 2025, CFGC and CDFW sent letters via email and postal mail to the CDFW tribal contact list to specifically offer formal consultation or informal meetings on the 2023 MPA Petitions. CDFW also presented written and verbal updates at meetings of CFGC's Tribal Committee. These outreach efforts to tribes are summarized in Table 2.

Summary of additional outreach and engagement with tribes for Tribally-led petitions

At the August 12, 2025, CFGC's Tribal Committee meeting, the Tribal Committee identified four of the 2023 MPA Petitions as Tribally-led petitions, which are petitions that were submitted by a tribe, representative designated by a tribe, or tribal organization, or have a tribal co-sponsor. These included:

- 2023-19MPA submitted by Santa Ynez Band of Chumash Indians
- 2023-20MPA submitted by Santa Ynez Band of Chumash Indians
- 2023-21MPA submitted by Tolowa Dee-ni' Nation
- 2023-29MPA submitted by Natural Resource Defense Council (NRDC), Santa Ynez Band of Chumash Indians (SYBCI), and Environmental Defense Center

At the May 7, 2025, meeting, CFGC's Tribal Committee requested CDFW send additional offers to all tribes for consultation on the remaining 2023 MPA Petitions and to reach out to offer to meet with tribes associated with the Tribally-led petitions. On October 16,

2025, CDFW distributed to the CDFW statewide tribal contact list a letter offering joint tribal consultation with CDFW and CFGC on any 2023 MPA Petition. This letter was also included in the fall quarterly CDFW Tribal Updates email. As of July 2026, no tribes have requested consultation.

On November 24, 2025, CFGC received a letter from Northern Chumash Tribal Council and NRDC indicating that Northern Chumash Tribal Council was a formal co-sponsor for petition 2023-28MPA, and requested CFGC consider the petition a Tribally-led petition.

At the December 9, 2025, CFGC Tribal Committee meeting, the CFGC Tribal Committee reconsidered the designation of petition 2023-28MPA and recommended CFGC designate it as a Tribally-led petition in light of the November 2025 co-sponsorship from Northern Chumash Tribal Council. At the December 11, 2025, CFGC meeting, CFGC designated petition 2023-28MPA as a Tribally-led petition. CFGC's Tribal Committee requested that before releasing the Tribally-led petition evaluations, CDFW engage with the tribes leading or co-leading petitions, including to better understand the intent of the petitions, and then share an update on the engagement and any clarifications on the petitions at the April 14, 2026 CFGC Tribal Committee meeting. CFGC's Tribal Committee and CFGC reaffirmed that CDFW should use the Evaluation Framework approved by CFGC in August to evaluate the Tribally-led petitions.

At the February 11, 2026, CFGC meeting, CFGC approved the addition of an agenda item for CDFW to provide an update and to have a discussion on the Tribally-led petitions at the April 14, 2026, Tribal Committee meeting.

Between September 2025 and June 2026, CDFW participated in discussions with representatives of tribes regarding the Tribally-led petitions.

At the April 14, 2026, CFGC Tribal Committee meeting, tribal representatives provided an overview and clarifications for the five Tribally-led petitions. SYBCI proposed amendments to 2023-19MPA, 2023-20MPA, and SYBCI and NRDC proposed amendments to 2023-29MPA_AM1. Northern Chumash Tribal Council and NRDC proposed amendments to 2023-28MPA_AM1. No amendments were proposed for 2023-21MPA. CDFW presented an update on tribal outreach and engagement since December and summarized the clarifications and proposed amendments for the Tribally-led petitions. At the meeting on April 15, 2026, the CFGC Tribal Committee recommended to CFGC that CDFW evaluate the Tribally-led petitions according to the proposed amendments and clarifications discussed during the meeting. CFGC subsequently referred the amended petitions (2023-19MPA_AM1, 2023-20MPA_AM1, 2023-21MPA_AM1, 2023-29MPA_AM2, and 2023-29MPA_AM2) to CDFW for evaluation using the Evaluation Framework approved by CFGC in August 2025.

Table 2. Summary of CDFW tribal outreach and engagement to date related to the 2023 MPA Petitions and petition process, including communication method and type of content. Unless otherwise specified, all tribal outreach communications included tribes listed on the CDFW tribal contact list maintained by CDFW's Department Tribal Liaison, which includes 400 people from the NAHC Contact List and additional tribal representatives.

Date	Method	Content
5/31/2024	Email	Released Blog Post: Seeking Your Feedback to Help Manage California's Marine Protected Area Network
10/4/2024	Email	CDFW Informational MPA DMR Petition Process Update: Background, DMR petition process, next steps, upcoming meetings
10/25/2024	Email	Released Blog Post: MPA Day
11/22/2024	Email	CDFW Informational MPA DMR Petition Process Update: Background, DMR petition process, next steps, upcoming meetings
4/11/2025	Email	CDFW Tribal Liaison provided Department update email, including CDFW Informational MPA DMR Petition Process Update
5/7/2025	Tribal Committee: Meeting Materials	Written Informational Update: California's Marine Protected Area Network Decadal Management Review and Subsequent Marine Protected Area Regulation Amendment Petition Process (pg. 99 of 129) Verbal update on the 2023 MPA Petitions and draft evaluation framework by Susan Ashcraft, CFGC Marine Advisor
8/14/2025	Tribal Committee: Meeting Presentation	Presentation by Craig Shuman, CDFW Marine Region Manager, on 2023 MPA Petitions and draft evaluation framework. Tribal Committee identified four Tribally-led petitions
9/2025	Email	CDFW invitation to meet to discuss petitions sent to petitioners for the four Tribally-led petitions
10/16/2025	Mail	Invitation Letter for joint tribal consultation with CDFW and CFGC on any 2023 MPA Petition
10/17/2025	Email	CDFW Tribal Liaison - Department update email, including CDFW Informational MPA DMR Petition Process Update and Invitation Letter for Joint Tribal Consultation
10/20/2025 – 6/24/2026	Meetings	Discuss Tribally-led petitions with tribal petitioners

Date	Method	Content
12/9/2025	Tribal Committee	CDFW update on the 2023 MPA Petitions and upcoming release of CDFW petition evaluations and outlining three regional meetings to be held to discuss petitions and evaluations
4/14/2026	Tribal Committee	CDFW presentation to provide an update on tribal outreach and engagement, and summarize clarifications and proposed amendments for Tribally-led petitions
6/26/2026	Email	CDFW Tribal Liaison provided Department update email, including CDFW Informational MPA DMR Petition Process Update and upcoming meetings to discuss the 2023 MPA Petitions

CLIMATE RESILIENCE AND MPAS

Since implementation of California's MPA Network, the state's coastal ecosystems have experienced increasingly significant climate-driven changes, including marine heatwaves, ocean acidification, and shifting species distributions. Although climate change was not explicitly incorporated into the MLPA Initiative planning process, the MPA Network was designed using resilience-oriented principles. Foundational design elements such as habitat replication, larval connectivity, and varying levels of protection were incorporated conservatively to support biodiversity, ecological function, and ecosystem resilience under uncertain and changing environmental conditions, including natural disturbances, decadal oceanographic variability, and unanticipated increases in fishing pressure.

MPAs are most effective at reducing extractive pressures, and their contribution to climate resilience depends in part on whether they measurably enhance key network attributes, such as connectivity, habitat replication, and protection of climate refugia. CDFW evaluated whether proposed changes were likely to meaningfully contribute to MPA Network performance through improvements to connectivity, habitat redundancy, or related ecological functions or provide measurable ecological benefits relative to the current performance of the MPA Network. Where existing MPAs already meet the SAT Science Guidelines established during the MLPA Initiative planning process, and proposals do not provide evidence the proposed change would demonstrably improve connectivity, redundancy, or resilience under changing environmental conditions and as specifically defined in the SAT Science Guidelines, the addition or expansion of a protected area alone is insufficient to conclude that climate resilience would be enhanced. Although there is broad evidence of increasing environmental stressors, restricting fishing alone will not address their cumulative impact. The existence of multiple stressors does not justify specific boundary modifications or new MPAs in the

absence of strong evidence that the proposal would likely result in site-specific ecological benefits.

MPAs may confer some resiliency to climate change by providing a buffer from some of these stressors, especially MPAs that limit or completely exclude fishing. Management of California's fisheries is mandated by the Marine Life Management Act, which includes objectives such as ecosystem protection, sustainability, and rebuilding populations, among others (Fish & G. Code § 7050). While the primary function of MPAs in California is to protect and enhance marine habitats and populations, understanding how effective fisheries management measures interact with a functioning MPA Network to bolster resiliency to climate change in California is still a critical knowledge gap identified in the DMR to be addressed through implementation of Recommendations 26-28 that focus on influencing factors and fisheries integration.

The absence of demonstrable ecological gains is particularly relevant where proposed changes could result in substantial socioeconomic impacts to ocean users. This underscores the importance of grounding management decisions in clear, place-based specific evidence of functional ecological improvement and considering socioeconomic impacts so that anticipated conservation benefits are considered relative to potential trade-offs in those areas.

CDFW 2023 MPA BIN 2 PETITION EVALUATION

EVALUATION QUESTIONS

Question 1: Does the proposed change support the MPA Network in meeting one or more of the MLPA Goals and align with MPA Master Plan adaptive management objectives?

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

MLPA Goals

1. Protect the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems.

2. Help sustain, conserve and protect marine life populations, including those of economic value, and rebuild those that are depleted.
3. Improve recreational, educational and study opportunities provided by marine ecosystems that are subject to minimal human disturbance, and to manage these uses in a manner consistent with protecting biodiversity.
4. Protect marine natural heritage, including protection of representative and unique marine life habitats in CA waters for their intrinsic values.
5. Ensure California's MPAs have clearly defined objectives, effective management measures and adequate enforcement and are based in sound science guidelines.
6. Ensure the State's MPAs are designed and managed, to the extent possible, as a network.

Master Plan Adaptive Management Objectives

- Protect the structure and function of marine ecosystems
- Improve native marine life populations, including those of economic value
- Ensure minimal disturbance while allowing for sustainable opportunities for recreation, education and research
- Ensure comprehensive representation of all key habitats, including unique habitats
- Use learning acquired through administration of the MPA Management Program to adaptively manage the objectives, management measures, enforcement efforts, and scientific guidelines to inform management decisions
- MPAs function as a cohesive statewide network

Question 2a: Does the proposed change advance adaptive management recommendations in the Decadal Management Review?

California's Marine Protected Area Network Decadal Management Review
DMR Adaptive Management Recommendations

Question 5: Are there significant information gaps that need to be filled to inform the evaluation of the proposed change?

Justice, Equity, Diversity, and Inclusion

There are information gaps related to assessing issues around equity and access for traditionally underserved or marginalized communities within the existing MPA Network, as well as the proposed changes in the Bin 2 petitions. The DMR includes recommendations to advance work in this area that the MPA Management Program intends to work on in the near future. Also, see response for Questions 14 and below.

Economic and Fiscal Impacts

The CFGC petition form, Petition to the California Fish and Game Commission for Regulation Change, requires the petitioner to complete the section, "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." Responses provided in the Bin 2 Petitions often had limited data related to potential economic and fiscal impacts, particularly those related to individuals or businesses, including individuals from the sport and commercial fishing industries. This may be due to limited time provided to petitioners to prepare petitions or to the limited existence of this data. However, given the scope and timeline of this analysis, CDFW did not have the ability to provide a supplemental analysis of the economic or fiscal impacts for the 73 changes proposed across the 15 Bin 2 Petitions.

Fish and Game Code section 2853 highlights that the Marine Life Protection Program (now the MPA Management Program) must include a process for the establishment, modification, or abolishment of existing MPAs or new MPAs, that involves all interested parties, including, but not limited to, individuals from the sport and commercial fishing industries, aquaculture industries, coastal and ocean tourism and recreation industries, marine conservation organizations, local governments, marine scientists, and the public (Fish & G. Code § 7050 (b)(7)), and that facilitates the designation of MPAs consistent with the Master Plan adopted pursuant to Fish and Game Code section 2855. Fish and Game Code section 2855 states that when making decisions regarding the siting of new MPAs and major modifications of existing MPAs, CDFW shall take into account relevant information including, but not limited to, the socioeconomic and environmental impacts of various alternatives.

CDFW's Bin 2 MPA Petition evaluations include preliminary assessments of socioeconomic impacts to commercial and recreational fisheries, but these assessments are not a substitute for the relevant information required by Fish and Game Code section 2855. The evaluations do not include an assessment of any socioeconomic benefits or impacts beyond impacts to commercial and recreational fisheries. Implementation of the regulatory changes proposed in the Bin 2 MPA Petitions are anticipated to have socioeconomic impacts, some of which may be significant to individuals or businesses; and additional data and information are needed to meet the level of analyses required by Fish and Game Code section 2855.

Question 9: Does the proposed change improve individual MPA or MPA Network design so that it better aligns with or meets the MPA science guidelines?

To ensure consistency across petition evaluations, CDFW developed a decision tree to evaluate if a proposed action would improve individual MPA or MPA Network design and/or improve alignment with the SAT Science Guidelines (Figure 1). The decision tree includes considerations such as whether the proposed change has the potential to affect the MPA's size or Level of Protection (LOP) and includes a framework to respond to the question. The science-based design criteria were developed by the SAT during the MLPA Initiative planning process to provide quantitative guidance for achieving network-scale ecological objectives (e.g., North Coast Study Region guidance Executive Summary from the North Coast SAT Methods Used to Evaluate MPA Proposals). While there were slight deviations between planning regions in the amount of individual habitat types necessary to meet habitat representation and replication targets, key design elements were consistent statewide. MPAs intended to contribute to ecological goals were required to be at least 9 square miles in size and meet one of the three highest LOPs (Very High, High, or Moderate-High). Importantly, the analysis focused not only on whether proposals meet SAT Science Guidelines, but on whether they would likely provide a net ecological benefit to the MPA Network in addition to meeting SAT Science Guidelines—that is, likely to have measurable improvements beyond existing conditions.

Levels of Protection

California's SAT developed the LOP framework during the MLPA Initiative planning process. California's SAT LOP framework is specifically designed to evaluate fishing-related impacts within the state's MPAs and considers the species that may be taken, the gear used, the geographic region, and the potential direct and indirect ecological effects of those activities on species and habitats. As a result, the SAT LOP framework is the most appropriate framework to use when considering proposed changes or additions to the MPA Network as it was tailor-made for evaluating and comparing California's MPAs.

The SAT LOP framework differs substantially in scope, structure, and application from the protection categories defined in Grorud-Colvert et al.'s (2021) MPA Guide[1]. Although the MPA Guide provides a valuable global framework for making standardized comparisons of MPA outcomes worldwide, it is not an appropriate framework for evaluating California's 2023 MPA Petitions. The two frameworks were developed for different purposes, applied different criteria, and the frameworks differ in scale and structure. Given the two frameworks have different scales and approaches, protection categories

[1] Grorud-Colvert *et al.* (2021). *T*he MPA Guide: A framework to achieve global goals for the ocean. *Science* **373**, eabf0861(2021). DOI:10.1126/science.abf0861; see also https://mpa-guide.protectedplanet.net/resources

that appear similar in name may represent substantially different regulatory conditions and ecological outcomes under the two systems.

The MPA Guide was designed to compare MPAs globally as MPAs around the world vary from fully protected with strong implementation measures (such as those in California's MPA Network), to MPAs on paper only or those that allow activities such as intensive fishing and/or large impact infrastructure and aquaculture. The MPA Guide uses broad activity-based classifications that consider multiple categories of human use. Fishing is treated as one of several activity categories evaluated. Others include dredging and dumping, anchoring, infrastructure, aquaculture, non-extractive activities, and mining. The MPA Guide includes protection levels based on the number and types of activities allowed, without differentiating by species, fine-scale gear type(s), or geographic context. The MPA Guide captures the global scale of allowed activities in MPAs worldwide and categorizes these into four LOPs. The approach enables comparisons across global habitats and activities, which vary greatly. In contrast, California's SAT LOP framework has six levels of protection and is specifically tailored to the fisheries, gear types, species, and habitats in the MLPA planning regions, which enable precise assessments of potential contribution to ecological goals as well as comparisons within California's MPA Network.

In addition to being more relevant to California, the SAT LOP framework applies a more precautionary approach than the MPA Guide framework. During the MLPA Initiative planning process, the SAT evaluated allowed activities under the assumption that they could occur at maximum plausible intensity over time. This reflected the expectation that MPA access would remain open to all users and that fishing pressure could increase unpredictably in the future. For example, during the COVID-19 pandemic, California experienced an unanticipated surge in the harvest of intertidal organisms for sale and subsistence. By comparison, under the MPA Guide LOP framework, potential future increases or sudden changes in fishing intensity, such as the example described above, are not explicitly incorporated into protection level assignments. Instead, the 2021 MPA Guide evaluates activities based on their current intensity, scale, duration, frequency, and overall present-day impact. Its framework is therefore intended to categorize MPAs according to contemporary cumulative impact levels rather than to distinguish in detail among specific fishing practices or ecological interactions. Consequently, the LOPs between the two frameworks are not comparable, and the SAT LOP framework is the most appropriate framework to use for evaluating the 2023 MPA Petitions.

Please see the CDFW Science Guide to California's MPA Network for more specific information on science evaluation of MPA proposals during the MLPA Initiative planning process, including LOPs, as well as a current assessment of how the MPA Network conforms to the SAT Science Guidelines.

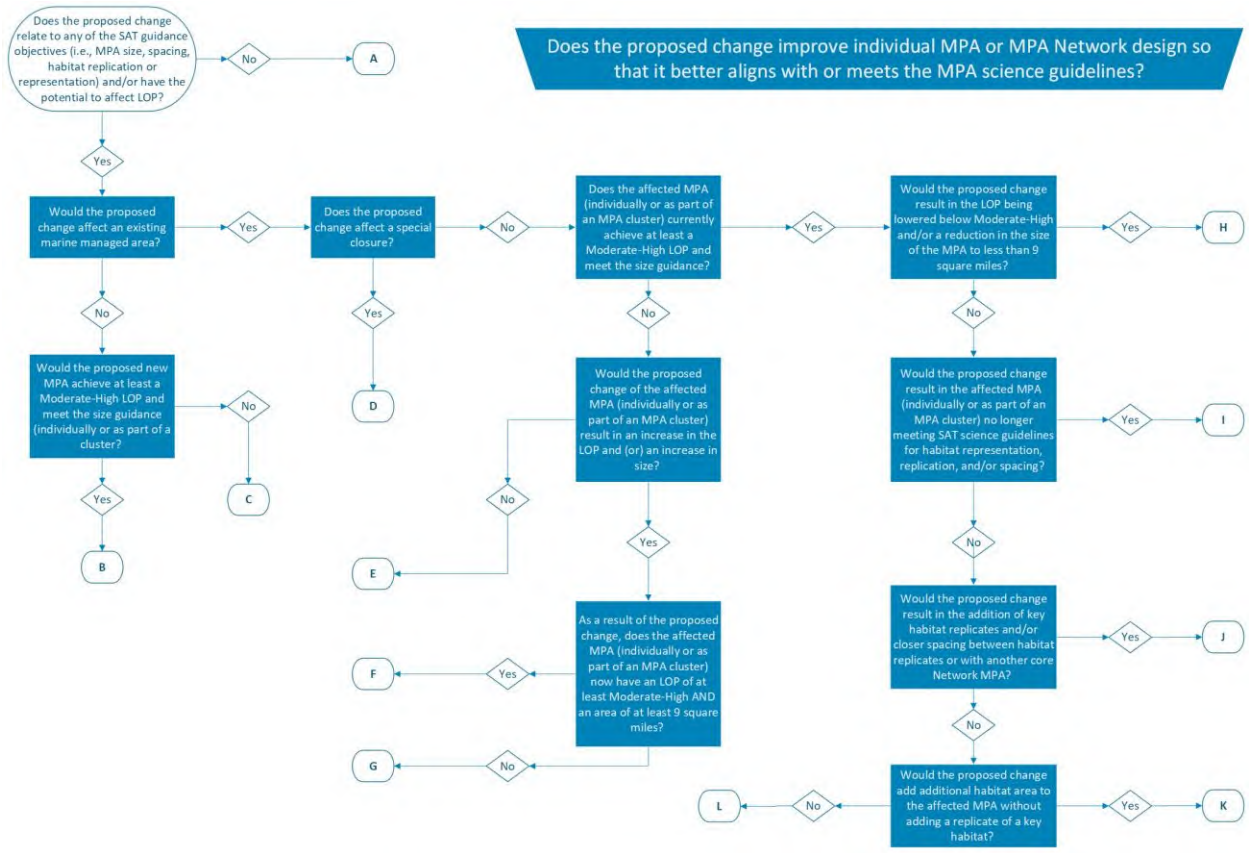


Figure 1. Decision tree framework used to formulate responses for Question 9 for each proposed action. The starting point, at the upper left corner, is based on whether the proposed change has the potential to affect the MPA's size or Level of Protection (LOP). The rest of the questions help to identify the effects such a change may have on the design of the individual MPA and the MPA Network. Based on this decision tree, the effects of a proposed action were determined to belong to one of the following groups:

A. Not applicable because the proposed action does not affect MPA size or LOP. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the SAT Science Guidelines.
B. New MPA meets minimum size and LOP requirements. Proposed action would improve MPA Network design and enhance alignment with the SAT Science Guidelines.
C. New MPA does not meet minimum size and/or LOP requirement. Proposed action does not improve MPA Network design, nor does it enhance alignment with the SAT Science Guidelines.
D. Not applicable because the SAT Science Guidelines do not apply to special closures. Proposed action does not improve MPA Network design, nor does it enhance alignment with the SAT Science Guidelines.

E. Neither existing MPA nor as proposed meets minimum size and/or LOP requirement. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the SAT Science Guidelines.
F. Existing MPA does not meet minimum size and/or LOP requirement, but would meet both as proposed. Proposed action improves the design of the individual MPA and the MPA Network, and enhances alignment with the SAT Science Guidelines.
G. Existing MPA does not meet minimum size and/or LOP requirement. Proposed change improves individual MPA design, but does not improve MPA Network design or enhance alignment with the SAT Science Guidelines.
H. Existing MPA meets minimum size and LOP requirements, but no longer would as proposed. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the SAT Science Guidelines.
I. Existing MPA meets minimum size and LOP requirements. MPA as proposed meets both criteria but no longer meets one or more SAT Science Guidelines. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the SAT Science Guidelines.
J. Existing MPA meets minimum size and LOP requirements. Proposed action results in meeting additional SAT Science Guideline(s). Proposed action improves design of individual MPA and MPA Network, and enhances alignment with the SAT Science Guidelines.
K. Existing MPA meets minimum size and LOP requirements. Proposed action increases the amount of habitat(s) protected but additional SAT Science Guidelines are not met. Proposed action improves the design of the individual MPA but not of the MPA Network, and does not enhance alignment with the SAT Science Guidelines.
L. Both existing MPA and as proposed meet minimum size and LOP requirements. Proposed action does not improve the design of the individual MPA or the MPA Network, nor does it enhance alignment with the SAT Science Guidelines.

Question 10a: Does the proposed change align with CDFW Feasibility Guidelines?

CDFW Feasibility Guidelines

Question 14: Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?

CDFW is committed to improving access to marine resources in California for traditionally underserved and marginalized communities. This question was included in

the evaluation framework because of that commitment, as well as input from partners to prioritize improvement of accessibility and recommendations from the DMR to integrate justice, equity, diversity, and inclusion principles into MPA Network management. However, after exploration of the available information and methods that could be used to address this question for each proposed action, CDFW originally determined that providing the level of evaluation this question and the relevant communities deserve would not be possible within the scope and timeline of the petition evaluations. Most of the petitions did not include sufficient information to accurately assess benefits and/or impacts to historically marginalized and underserved communities. Additional details and outreach were needed by petitioners to support this portion of the analysis.

At the time, CDFW reviewed multiple information sources, and found there are many different approaches to defining and identifying "traditionally underserved or marginalized communities." CDFW reviewed the definition of disadvantaged communities (DACs) in Senate Bill 535, which is based on pollution burden and federally recognized tribal status (a map of DACs per this definition is available here, data used to determine community status is available through the CalEnviroScreen tool).

CDFW also considered the definition of DACs utilized by the California Department of Water Resources, where DACs are areas where median annual household income is 80% or less of the statewide median annual household income (a map of those communities is available here).

CDFW found the data and information in the California Governor's Office of Land Use and Climate Innovation's Vulnerable Communities Platform to be valuable in understanding access issues related to the MPA Network. The Vulnerable Communities Platform provides information on more specific and potentially applicable metrics, such as food insecurity and linguistic isolation, which could be used to better understand access issues (e.g., subsistence fishing, language access for outreach materials, individual indicators data is available here).

In the March 2026 Companion Document, CDFW's primary findings for Question 14 were that additional information and time were needed, including completion of some DMR Recommendations, to sufficiently address the question.

Following CDFW's submission of the petition evaluations, CFGC, CDFW, and Ocean Protection Council received substantive feedback identifying two areas of concern. First, the response to Question 14 was unsatisfactory and that people, including Commissioners, wanted to see additional analysis for Questions 14 and 16. Second, people identified a broader need for more robust engagement with, and meaningful

incorporation of the perspectives of, traditionally underserved and marginalized communities throughout the process.

At the Regional 2023 MPA Petitions meeting on May 19, 2026, CFGC directed CDFW to convene experts in Justice, Equity, Diversity and Inclusion within the agency and at partner agencies to provide additional analyses. CDFW's Deputy Director of Strategic Engagement, Equity, and Partnerships led this work in collaboration with California Natural Resources Agency, CFGC staff, and Ocean Protection Council and released a separate document with supplemental information for Question 14 and 16.

Question 16: Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?

CFGC staff conducted this analysis and prepared the response to Question 16, which was supplemented by a July 2026 document prepared as described in the paragraph above.

Justice, Equity, Diversity and Inclusion Policy Overview

The CFGC Justice, Equity, Diversity and Inclusion Policy (JEDI Policy) reflects CFGC's deep commitment and responsibility to support safe and equitable access to California's thriving native wildlife and natural habitats, supported by inclusive decision-making that reflects the needs and values of the state's diverse communities. The policy acknowledges the significant past injustices experienced by historically marginalized and underserved communities and seeks to correct the burdens these communities have faced in accessing nature, participating in regulatory decision-making, and the privilege often associated with outdoor access. The JEDI Policy also considers and seeks to correct the disproportionate burdens on California Native American tribes and recognizes their interwoven stewardship relationships with the environment.

The JEDI Policy identifies 13 individual commitments referred to as "actions" that guide how CFGC advances its JEDI commitments. Implementation of the policy has been an ongoing priority of CFGC since its adoption in February 2022 and CFGC staff are continuing to explore meaningful ways to meet its commitments. Inclusion of the JEDI Policy in the Framework was intended to highlight this commitment.

Evaluation of MPA Petitions

Evaluating MPA petitions for their consistency with CFGC's JEDI Policy marked the first time CFGC staff attempted to systematically apply the policy's principles to inform CFGC decision-making. Through the process of evaluating MPA petitions against the JEDI Policy, CFGC staff found it was unable to make determinations about whether, or to

what extent, any specific petition advances or conflicts with the JEDI Policy. The findings are described in detail here, along with next steps to resolve these limitations moving forward.

CFGC staff reviewed the pending MPA petitions to identify conceptual intersections with JEDI principles. Of the 13 commitments in the policy, 7 are not relevant to the evaluation because they focus on internal operations, partnerships, and governance processes. The remaining six are directly applicable to the MPA petitions:

- Considering and correcting for disproportionate burdens on historically marginalized communities,
- Improving responsiveness to the needs of marginalized fish and wildlife users,
- Amplifying tribal voices and issues,
- Considering the implications of decisions on subsistence activities,
- Improving and championing safe and equitable access to abundant and healthy fish and wildlife populations, and
- Promoting cultural, community, and economic opportunities related to fish and wildlife that CFGC regulates.

In seeking to apply the six applicable commitments, staff identified several knowledge gaps that limited its ability to provide consistent or objective petition-level JEDI determinations. Ultimately, CFGC staff concluded that there is insufficient information available to meaningfully assess potential JEDI-related implications of petitions in a manner that reflects the intent of the policy.

Key concepts such as subsistence activities, equitable access to abundant fish and wildlife populations, and cultural, community and economic opportunities do not have CFGC-adopted definitions, metrics, or measurable criteria. Without clearly articulated definitions, datasets, or rubrics, petition-specific JEDI assessments would be inherently speculative. Staff have, however, gained a clearer understanding of these gaps, which will be important to address in future policy implementation.

Tribally-Led Petitions

One area that CFGC has already recognized is the distinct role of petitions that amplify tribal voices, which is reflected in how CFGC has grouped these petitions for discussion. Five petitions were submitted either by a tribe or with tribal participation as co-sponsors for petitions submitted by non-tribal proponents. CFGC has grouped these as “Tribally-led,” which includes tribally co-sponsored petitions. Some of these petitions advance tribally identified MPA names and, in some cases, include recommendations related to pursuing co-management or co-stewardship. Collectively, they reflect the

interests of federally recognized tribes as well as non-federally recognized tribal communities with enduring relationships to California's coast. Many of these proposals have the potential to foster long-term partnerships or shared leadership with California Native American tribes, which are considered marginalized and/or underserved communities, supporting the broader intent of CFGC's JEDI Policy.

Petitioner Intent

CFGC staff acknowledges that several petitions explicitly reference, within their petition rationale(s), goals related to equitable access, subsistence activities, long-term abundance of fish and wildlife, or other JEDI-related intentions. While the stated intentions are important context, the previously described evaluation limitations prevented staff from assessing the degree to which these intentions may achieve the goals. CFGC staff acknowledges that changes to harvest or non-consumptive access may relate to subsistence or equity considerations, but cannot reliably characterize the nature or extent of those relationships without risking over-generalization or speculation.

Current and Future Focus

In the absence of the tools needed for petition-level JEDI analysis, and because many JEDI commitments were intended primarily to guide CFGC processes, CFGC staff began to focus on the overall petition process, including the planning for the regional MPA petition meetings. CFGC staff efforts have included: consulting with partners to inform development of approaches to support safe and inclusive participation, selecting meeting locations near affected communities to reduce travel barriers, elevating tribal voices, increasing transparency about meeting format and expectations, and exploring additional ways to provide accessible engagement opportunities. The regional meetings an opportunity for CFGC to engage with local communities regarding MPA petitions. Proposals that reflect community knowledge, lived experience, and local needs align more closely with the inclusive decision-making envisioned by the JEDI Policy. Public comments emphasizing the level of community engagement, or lack thereof, were not considered when conducting the petition evaluations.

Evaluation of the MPA petitions has highlighted critical next steps needed to strengthen CFGC's ability to apply the JEDI Policy in future evaluations. Consistent with the intent of Recommendation 8 in CDFW's Marine Protected Area Network Decadal Management Review — a mid-term priority focused on evaluating the accessibility of MPAs to various community groups — staff recognizes that broader collaborative efforts with various partners will be needed to establish the foundational elements for integrating JEDI considerations across the MPA Network. Advancing this work will support both the

CFGC's JEDI Policy goals and more meaningful future evaluations, beyond what is possible within the limited scope of this petition process.

Links

JEDI Policy: California Fish and Game Commission Justice, Equity, Diversity, and Inclusion Policy, approved February 16, 2022

JEDI Policy Definitions: California Fish and Game Commission JEDI Definitions

Question 17: Is the proposed change consistent with the CFGC Coastal Fishing Communities Policy?

CFGC staff conducted this analysis and prepared the responses to Question 17 for the proposed actions in the evaluations. CFGC staff provided this additional context for their evaluations of Question 17.

Coastal Fishing Communities Policy Overview

The CFGC Coastal Fishing Communities (CFC) Policy guides CFGC, in partnership with CDFW, in supporting the long-term needs, social well-being, and economic health of California's coastal fishing communities while upholding the conservation and management goals central to both agencies' missions and mandates. The CFC Policy defines coastal fishing communities broadly as: (a) social, cultural, economic, and/or place-based groups whose members are dependent upon, engaged in, or benefit from local, wild-capture, commercial, recreational, or subsistence marine harvest or processing to meet the social and economic needs of the community, (b) include, but are not limited to, the businesses and organizations that depend upon or support those activities, and (c) may be a subset or member of larger or associated coastal communities. Adopted in February 2024, the CFC Policy formalizes a vision for how CFGC engages with fishing communities, incorporates their needs into decision-making, and contributes to their resilience.

Evaluation of MPA Petitions

Evaluating MPA petitions for their consistency with CFGC's CFC Policy marked the first time CFGC staff have attempted to apply the policy's principles to inform CFGC decision-making. Through the process of evaluating MPA petitions against the policy, CFGC staff found they were unable to make determinations about whether, or to what extent, any specific petition advances or conflicts with the goals of the CFC Policy. The findings are described in detail here, along with next steps to resolve these limitations moving forward.

The goal of Question 17 is to identify where petitioned actions may conceptually intersect with the CFC Policy—not to evaluate biological outcomes addressed elsewhere in the petition evaluation framework or provide a full socioeconomic analysis.

As CFGC staff applied the CFC Policy to each petition and its proposed actions, it became clear that only limited information is currently available to assess potential implications for coastal fishing communities. The policy encompasses broad aims, such as maintaining or enhancing fishing opportunities, supporting community resilience and adaptive capacity, and ensuring coastal fishing community interests are meaningfully factored into CFGC decision-making.

However, CFGC does not yet have detailed economic, demographic, or cultural data to determine how proposed regulatory changes may affect specific coastal fishing communities. Existing statewide information—primarily the Ocean Sport Fishing web application and community profiles from FishingCommunities.net, last updated in 2023 using 2021 data—provides useful general context on ports, landings, and community characteristics. CFGC staff expertise and experience also contributed to the understanding of impacts of petitioned actions on nearby coastal fishing communities. These sources of information do not provide the level of resolution necessary to draw conclusions about individual community dependence, vulnerability, or long-term resilience.

Given the limitations, CFGC staff focused the evaluation on three elements that could be consistently and objectively applied across all petitions:

- Describes the nature of the proposed regulatory change,
- Identifies whether a petition action would increase, decrease, or have no direct effect on commercial or recreational fishing opportunity within or near the affected MPA, and
- Identifies the coastal fishing communities most geographically-proximate to the affected area, by identifying the nearest ports or harbors and travel distance between them, although these do not necessarily reflect smaller coastal fishing communities that may be affected.

Some petition actions were given “not applicable” responses, reflecting that those actions are not subject to evaluation as they are either not regulatory change requests or they are proposals outside of the regulatory framework for MPA management.

Some petitions propose increasing fishing opportunities, which could conceptually support short- or long-term community resilience within the context of California’s existing fishing regulations and the broader fisheries management goals, and other petitions propose strengthening or expanding MPAs, which may confer long-term

ecological benefits that indirectly support fishing communities. However, CFGC staff cannot evaluate the proposed changes on biological, stock-related, or long-term effects relative to supporting fishing opportunities under this question.

A full understanding of potential benefits or impacts to coastal fishing communities requires meaningful input from the community members themselves—commercial, recreational, and subsistence harvesters, as well as the businesses and organizations that support local fishing economies. CFGC staff view this evaluation as an initial step based on the information currently available, and not as a comprehensive assessment of the lived experience, priorities, or needs of individual communities. Public comments that provide such feedback have not been directly considered in the evaluation. While CFGC has received a wealth of public comments to inform its understanding of the range of views thus far, CFGC's upcoming regional MPA petition review meetings will provide an important opportunity for commenters to further supplement CFGC staff's analysis with direct feedback from those most connected to the affected areas. Continued dialogue with coastal fishing communities will help strengthen the foundation for applying the CFC Policy in future decision-making and improve CFGC's ability to better understand and support the adaptive capacity and long-term resilience of California's fishing communities over time.

Possible next steps in policy implementation and pathways to begin filling data gaps are anticipated for discussion at a future CFGC Marine Resources Committee meeting. This discussion ideally would lead to developing options and needs to enable integrating consideration of the CFC Policy into CFGC's decision-making.

Links

CFC Policy: California Fish and Game Commission Coastal Fishing Communities Policy, adopted February 14, 2024 (also included on the following page)

Current Regulations Map: Ocean Sport Fishing Web App

Partner website, California Fishing Communities, providing profiles of the history, economics, and culture of California's fishing communities (last updated in 2023 with 2021 data): FishingCommunities.net

SUMMARY OF OTHER CONSIDERATIONS

After completing the evaluations, none of the petition evaluations had information to include in this section beyond what was provided in the other five sections of the evaluation. Consequently, this section was removed from the evaluations.

2023 BIN 2 MPA PETITIONS

Evaluations and Recommendations for Non-Tribally Led Petitions

Dr. Craig Shuman, Marine Regional Manager
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

April 15, 2026

CALIFORNIA MARINE PROTECTED AREAS

Marine Life Protection Act

- Landmark legislation passed in 1999
- "California's MPAs were established on a piecemeal basis rather than according to a coherent plan and sound scientific guidelines…creates the illusion of protection…" FGC §2851 (a)
- Six MLPA Goals Fish & Game Code section 2853(b)
- Two unsuccessful attempts to implement in 2001 and 2002


N. Perkins

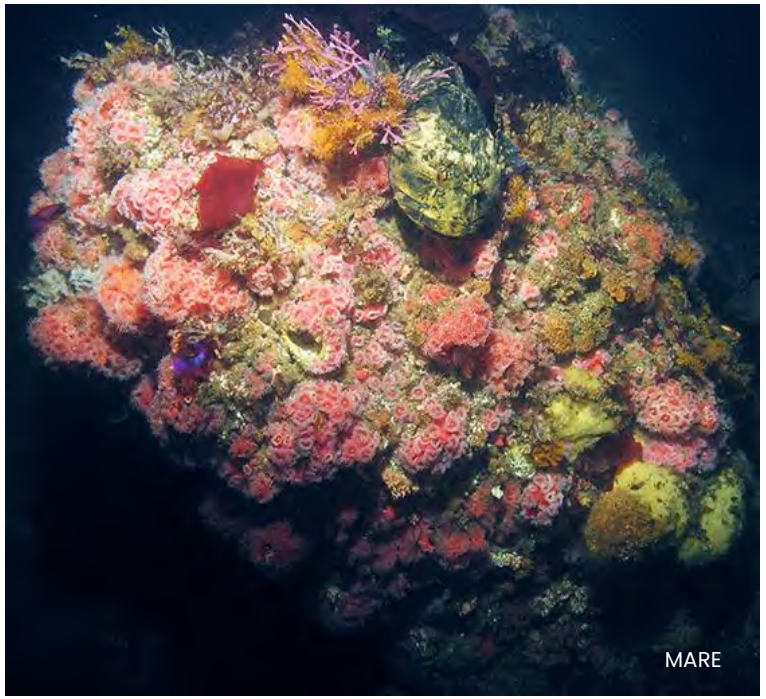
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Marine Life Protection Act Initiative

Public-Private Partnership formed in 2004

- Central Coast: 2005-2006
- North Central Coast: 2007-2008
- South Coast: 2008-2009
- North Coast: 2009-2011



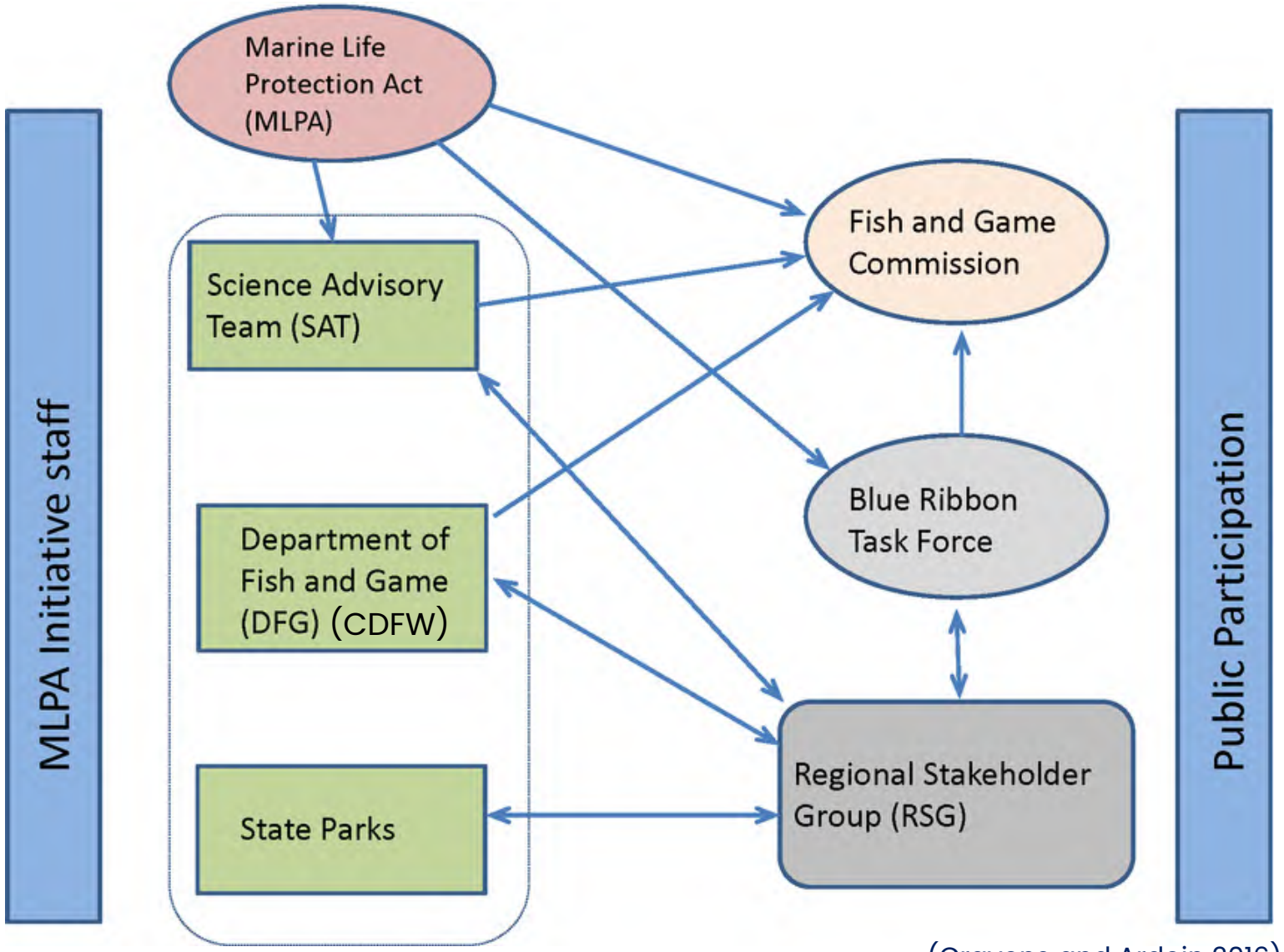
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Marine Life Protection Act Initiative (cont.)


BRTF, CDFW


Central Coast RSG, CDFW



(Cravens and Ardoin 2016)

Importance of Iteration

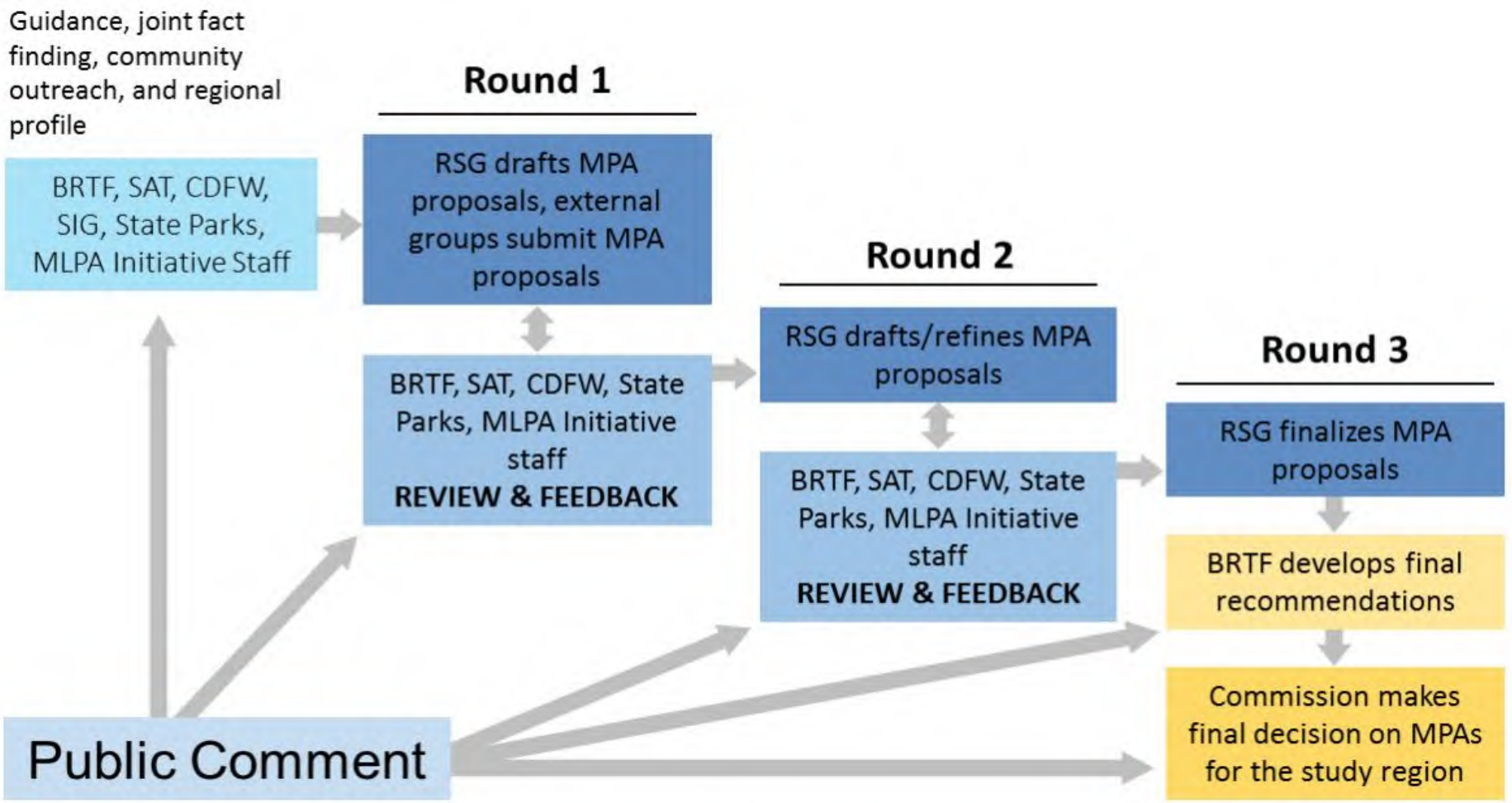
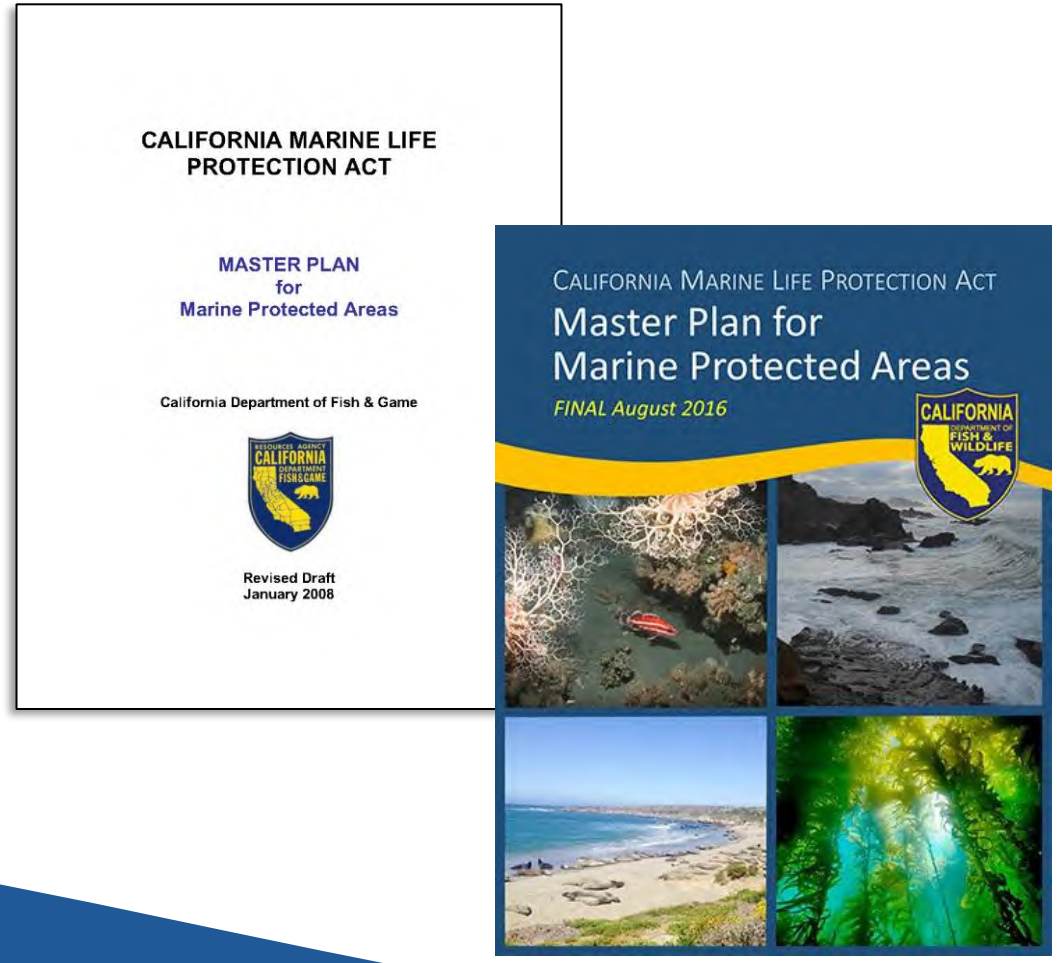


Figure 5. General process used by the MLPA Initiative to develop alternative MPA proposals in each regional MPA planning process or planning region.

Adaptive Management of the MPA Network

Master Plan for MPAs:

- 2008
- 2016
  - Outreach and Education
  - Research and Monitoring
  - Enforcement and Compliance
  - Policy and Permitting



CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Regional Management Reviews

- Channel Islands: 2008
- Central Coast: 2013
- North Central Coast: 2015
- South Coast: 2017
- North Coast: 2018



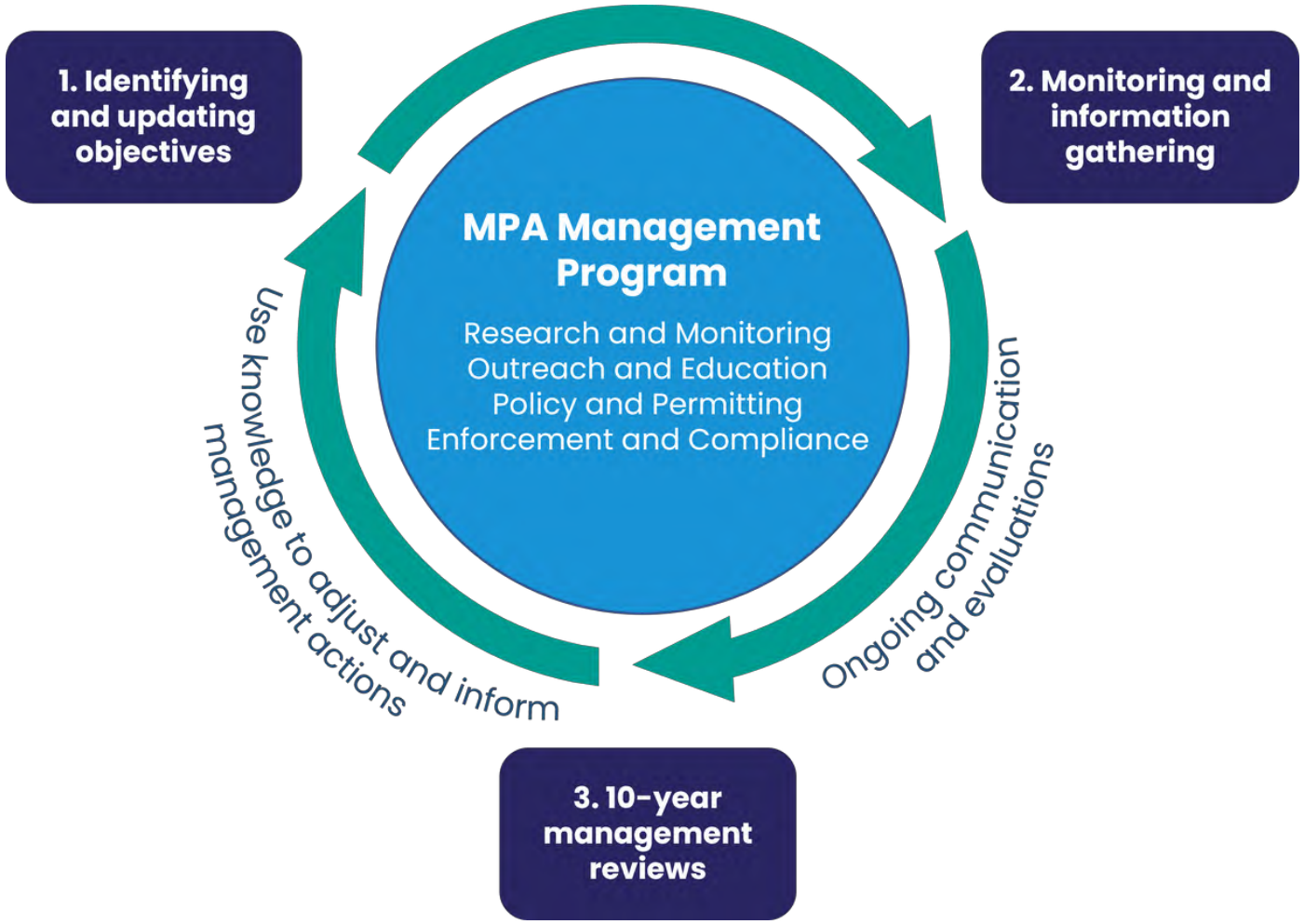
CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

MPA Network Management

Adaptive Process

- Long-term scientific monitoring
- Periodic Review: data expertly evaluated
- Ongoing, across all Management Pillars
  - Regulatory
  - Non-regulatory



Adaptive Management Regulatory Amendments

- 2014: Clean-up package*
- 2015: Clean-up package*
- 2016: Tribal take allowance
- 2018: Repeal of special closure due to private property issue
- 2018: Tribal take allowance, boundary modification
- 2022: SMRMA language clean-up
- 2023: Pre-existing structures

* General provisions, definitions, take, boundaries



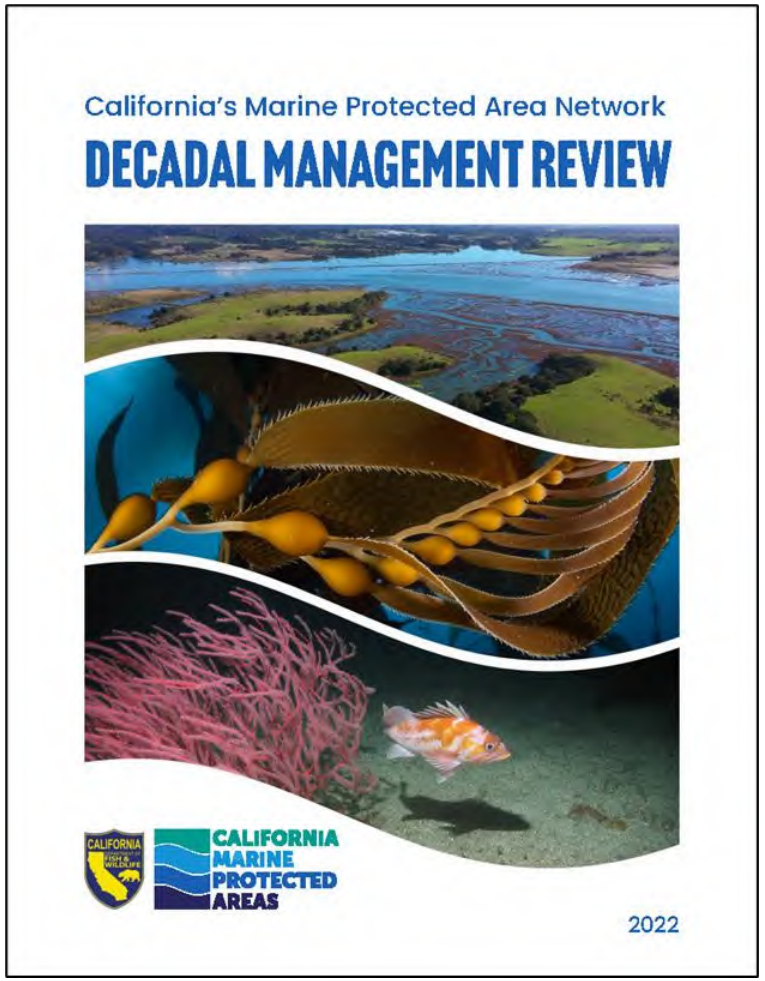
Amanda Van Diggelen CDFW

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Decadal Management Review Key Findings

- For some species and habitats, MPAs support populations of larger and/or more abundant fish and invertebrates
  - Results vary across bioregions, habitats, and other factors
- Evidence of enhanced connectivity, ecosystem integrity, and resilience
  - MPA Network is still young, more to learn
- Did not identify performance gaps that warrant significant structural modification
- Informed 28 priority recommendations
  - ~80 specific actions



DMR Adaptive Management Recommendations

Near-Term (ongoing – 2 years)

- Rec 1: Improve state agencies tribal engagement
- Rec 4: Apply Review knowledge to Network/Management changes
- Rec 7: Expand outreach and education materials
- Rec 9: Continue OPC coordination
- Rec 10: Improve coordination across Management Program pillars
- Rec 11: Update Action Plan
- Rec 16: More targeted outreach to specific audiences
- Rec 17: Improve SCP process
- Rec 18: Use policy to review MPA restoration/mitigation efforts
- Rec 20: Increase enforcement capacity
- Rec 21: Enhance citation record keeping and management
- Rec 25: Implement MPA climate change research
- Rec 27: Improve understanding of MPA effects on fisheries

Mid-Term (2 – 5 years)

- Rec 2: Create pathway to tribal MPA management
- Rec 3: Build tribal capacity to participate in MPA management
- Rec 6: Include and fund more diverse researchers and stakeholders
- Rec 8: Evaluate MPA accessibility
- Rec 12: Improve understanding of human dimensions
- Rec 13: Explore innovative technologies
- Rec 14: Develop MPA community science strategy
- Rec 15: Evaluate Outreach needs and resource effectiveness
- Rec 22: Increase knowledge on MPA judicial outcomes
- Rec 23: Examine MPA Network design attribute more effectively
- Rec 26: Consider climate change in human dimensions monitoring
- Rec 28: Integrate influencing factors into MPA performance evaluations

Long-Term (5- 10 years)

- Rec 5: Establish targets to meet MLPA goals
- Rec 19: Create MPA Enforcement Plan
- Rec 24: Better incorporate marine cultural heritage into MPA Network

2023 MPA Petition Process Milestones

Date	Milestone
Aug 2023	California Fish and Game Commission (CFGC) approves prioritization framework and to consider changes to the MPA Network using the existing CFGC petition process
Oct 2023	CFGC releases "Overview of Process to Consider Potential Changes to California's MPA Network"
Dec 2023	CFGC receives 20 MPA-related petitions with 80+ actions
Feb 2024	CFGC refers all 20 petitions to CDFW for evaluation
Apr 2024	CFGC adopts 3-phased approach to petition evaluation

2023 MPA Petition Process Milestones (2/3)

Date	Milestone
Aug 2024	CFGC approves binning petitions, requests CDFW evaluate Bin 1 petitions and develop a proposed framework to evaluate Bin 2 petitions
Nov 2024	CDFW releases recommendations for five Bin 1 petitions
Dec 2024	CFGC makes decisions on Bin 1 petitions and establishes March 14, 2025 deadline for amendments to Bin 2 petitions
Mar 2025	Deadline for amendments to Bin 2 petitions
Apr 2025	CFGC refers amended Bin 2 petitions to CDFW for evaluation
Apr–May 2025	CDFW develops Draft Bin 2 Petition Evaluation Framework with Ocean Protection Council and CFGC staff

2023 MPA Petition Process Milestones (3/3)

Date	Milestone
May 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions and proposed approach for evaluations
Aug 2025	• Update and discussion on MPA petitions and Draft Eval Framework at CFGC TC • CFGC TC identifies four Tribally-led petitions • CFGC approves framework for evaluating Bin 2 petitions
Dec 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions; identifies one more Tribally-led petition; directs CDFW to come back to April 2026 CFGC TC to discuss MPA Petitions
Mar 2026	CDFW releases evaluations and Companion Document for the ten non-Tribally-led Bin 2 MPA Petitions for the 64 proposed actions
Apr 2026	Update and discussion at CFGC TC on Bin 2 MPA petitions

2023 MPA Bin 2 Petition Evaluation Framework

CGFC Approved August 2025, includes:

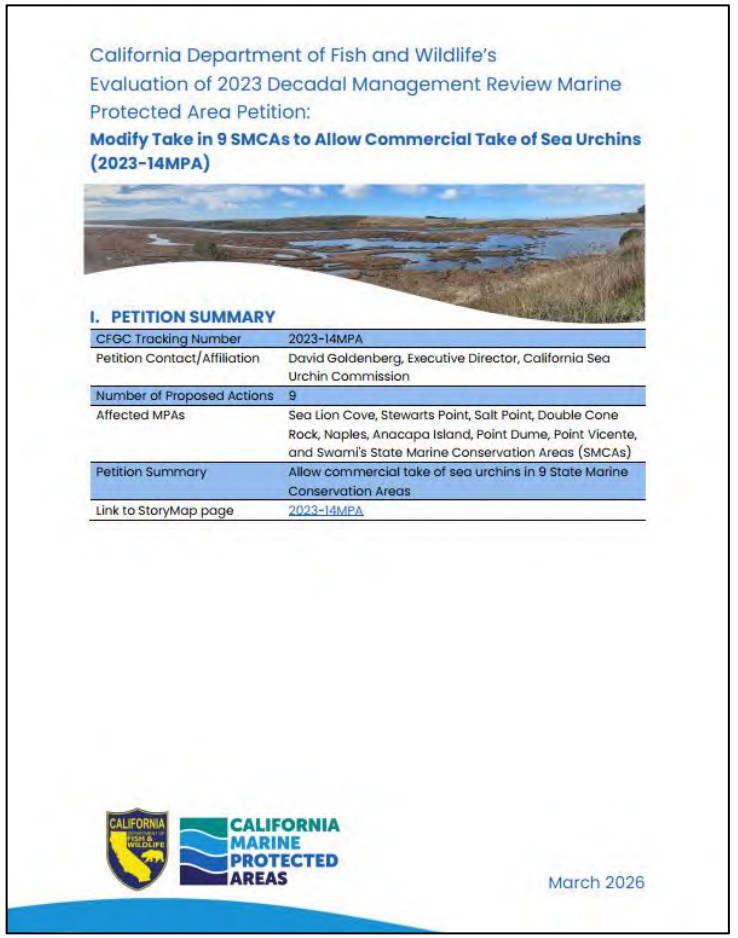
I. Petition Summary

II. CDFW Recommendations with Brief Justifications

III. Bin 2 Petition Grouping: Identify Tribally-led Petitions

IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation

V. Supplemental Analyses, Data and Information, and Citations



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

Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)

I. PETITION SUMMARY

CFGC Tracking Number	2023-14MPA
Petition Contact/Affiliation	David Goldenberg, Executive Director, California Sea Urchin Commission
Number of Proposed Actions	9
Affected MPAs	Sea Lion Cove, Stewarts Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's State Marine Conservation Areas (SMCAs)
Petition Summary	Allow commercial take of sea urchins in 9 State Marine Conservation Areas
Link to StoryMap page	2023-14MPA

CALIFORNIA MARINE PROTECTED AREAS

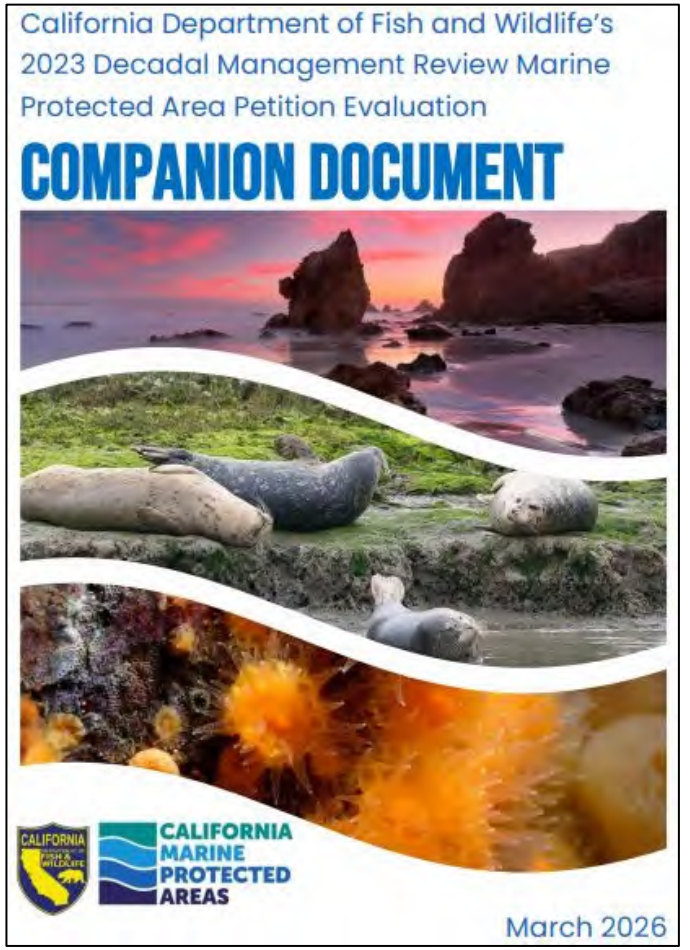
March 2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

2023 MPA Bin 2 Petition Evaluation Companion Document

- History of MPA Network Adaptive Management
- Summary of tribal outreach and engagement
- Supplemental information, reference materials, and additional context for evaluations



CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Tribally-led Petitions

- Submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or has a tribal co-sponsor.
- CDFW update provided at the April 14th CFGC Tribal Committee meeting, go to https://fgc.ca.gov/Meetings/2026 for more information.
- These five petitions (19, 20, 21, 28, and 29) are not included in this presentation.

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Presentation Format

- **Petitions presented in numeric order**
- **Two Formats**
  - Single slide: petitions with a single proposed action or group of similar actions
  - Multiple slides: petitions with multiple proposed actions
- **Content**
  - Title of petition/proposed action(s)
  - Summary of proposed action(s)
  - Petitioner rationale
  - CDFW Recommendation

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

2023-14MPA: Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchin

9 Proposed Actions Affecting:

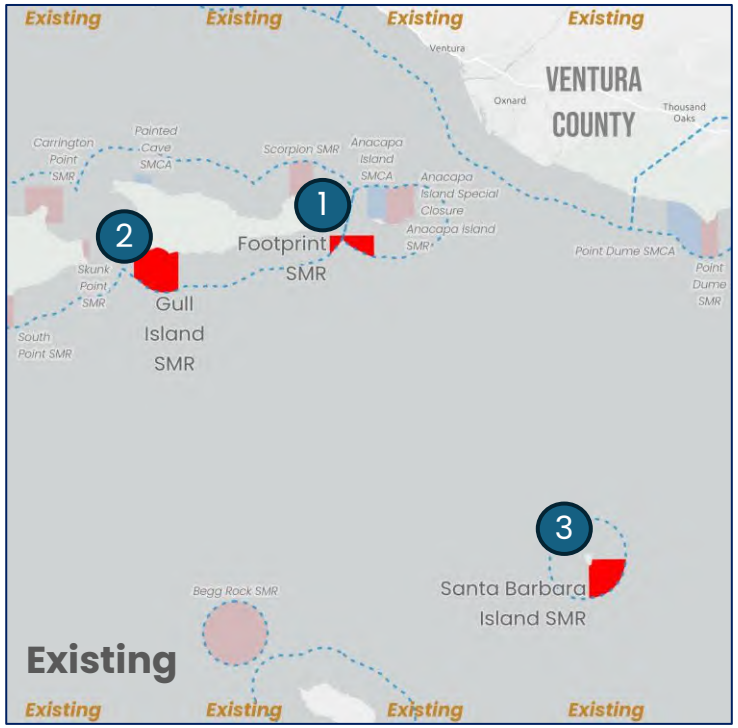
1. Sea Lion Cove SMCA
2. Stewarts Point SMCA
3. Salt Point SMCA
4. Double Cone Rock SMCA
5. Naples SMCA
6. Anacapa Island SMCA
7. Point Dume SMCA
8. Point Vicente No-take SMCA
9. Swami's SMCA

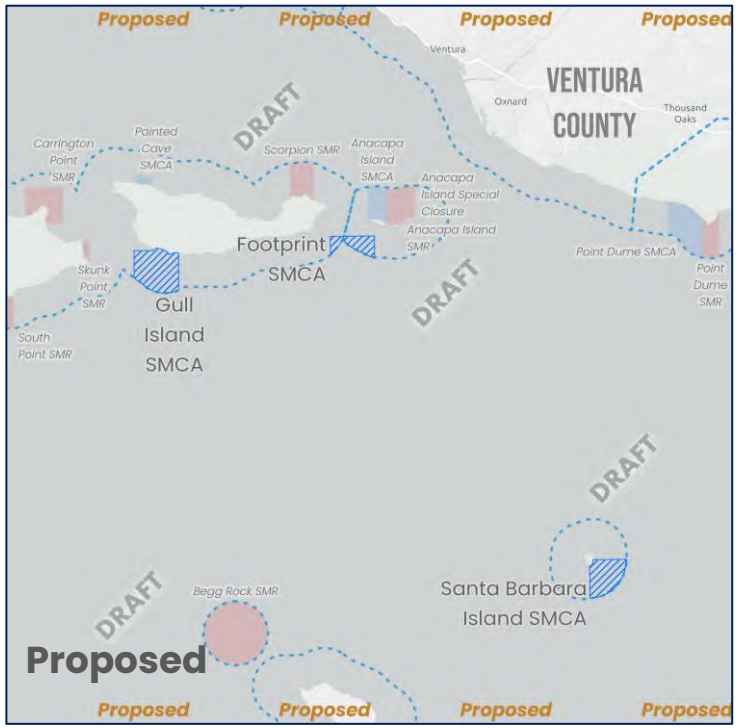


CDFW Recommendation:
DENY 2023-14MPA_1-9

2023-15MPA_AM: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

3 Proposed Actions: Reclassify 1. Footprint, 2. Gull Island, and 3. Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

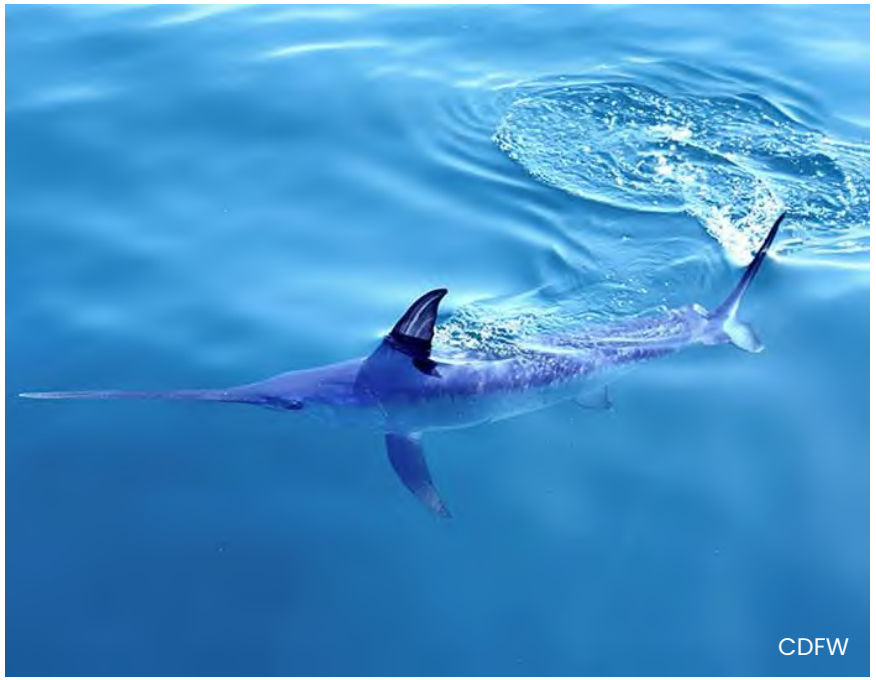




2023-15MPA_1-3_AM2: Reclassify Footprint, Gull Island, and Santa Barbara Island SMRs to SMCAs to Allow Take of Highly Migratory Species.

6 Petitioner Proposed Options:

Options	Recreational Take: Pelagic Finfish	Recreational Take: HMS	Commercial Take: Pelagic Finfish	Commercial Take: HMS	CPS
1	Hook and line, spear	N/A	Hook and line	N/A	N/A
2	N/A	Hook and line, spear	N/A	Hook and line	Possession
3	Hook and line, spear *no bottom contact	N/A	Hook and line *no bottom contact	N/A	N/A
4	N/A	Hook and line, spear *no bottom contact	N/A	Hook and line *no bottom contact	Possession
5	Spear	N/A	N/A	N/A	N/A
6	N/A	Spear	N/A	N/A	N/A



CDFW Recommendation:
DENY 2023-15MPA_1-3_AM2

2023-16MPA: Reclassify Stewarts Point and Bodega Head SMRs to SMCAs to Allow Commercial Salmon Trolling

2 Proposed Actions: Reclassify 1. Stewarts Point SMR and 2. Bodega Head SMR to SMCAs to Allow Commercial Salmon Trolling





CDFW Recommendation:
DENY 2023-16MPA_1-2

2023-18MPA: Modify Allowed Uses at Several Santa Barbara Channel MPAs and Special Closures: Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures

Summary of 7 Proposed Actions:

1. Allow recreational take of finfish from shore in Vandenberg SMR

   (2022-04) Allow recreational fishing at Surf Beach within Vandenberg SMR

2. *Continue support of M2 Monitoring at Point Conception

3. Change take at Kashtayit SMCA

4. *Change color of No-take Campus Point SMCA from purple to red

5-7. Eliminate the San Miguel Special Closure and Anacapa Island Special Closure (Full Island), Reduce the size of the Anacapa Island Special Closure (Seasonal)



***Non-regulatory**

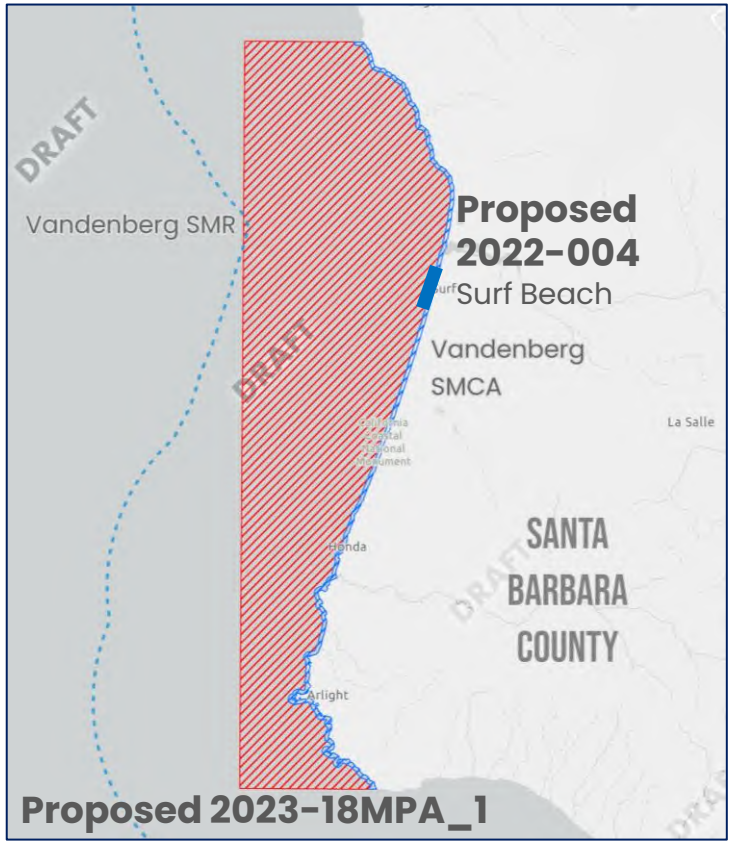
2023-18MPA_1 (and **2022-004**): Reclassify a portion of Vandenberg SMR to a SMCA with recreational take of finfish by hook and line from shore

Summary of Proposed Action:

1. Redesignate a portion of Vandenberg SMR to create a narrow SMCA alongshore for the entire length of Vandenberg SMR that allows recreational take of finfish by hook and line from shore.

   (2022-004): Redesignate a portion of Vandenberg SMR to create a small SMCA that allows shore fishing on the one half mile stretch of beach known as Surf Beach.





CDFW Recommendation:
DENY 2023-18MPA_1 and
DENY 2022-004

2023-18MPA_3: At Kashtayit SMCA, simplify take regulations to: "Recreational take of finfish, invertebrates, and giant kelp is allowed."

Summary of Proposed Action:

At Kashtayit SMCA, simplify take regulations to remove the strikethrough text in the following:

> *"Recreational take of finfish, invertebrates ~~(except rock scallops and mussels)~~, and giant kelp ~~by hand harvest~~ is allowed."*



CDFW Recommendation:
DENY 2023-18MPA_3

2023-18MPA_5-7: Eliminate San Miguel Special Closure; reduce size of Anacapa Island Special Closure and consider removing net/trap closure

Summary of Proposed Actions:

5. Eliminate pinniped special closure at San Miguel Island
6. Reduce the size of the brown pelican Anacapa Island Special Closure regulations to allow boat access to Frenchy's Cove
7. Reassess and consider removing the following special closure at Anacapa Island: "No net or trap may be used in waters less than 20 feet deep off the Anacapa Islands"


Z. Abbey

CDFW Recommendation:
DENY 2023-18MPA_5-7

2023-23MPA_AM: Modify Allowed Uses in Four Monterey Area MPAs, Create a New MPA, and Other Requests

Summary of 28 Proposed Actions:

1, 6, and 11. Prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active within 3 MPAs.

2, 7, 12, and 16. Allow unlimited recreational urchin removal in 4 MPAs.

3, 4, 5, 8, 9, 10, 13, 14, 15, 17, 18, and 19. Allow kelp out-planting , spore dispersal bags, and kelp pruning without an SCP.

20. Establish new Tanker's Reef SMR near Monterey.

23. *Restoration framework within MPAs and MMAs.

26. Allow commercial urchin harvest in MPAs.

28_AM1. *CFGC and CDFW promote kelp restoration collaboration on their website and in public outreach.

21, 22, 24_AM1, 25, and 27 Other Requests.

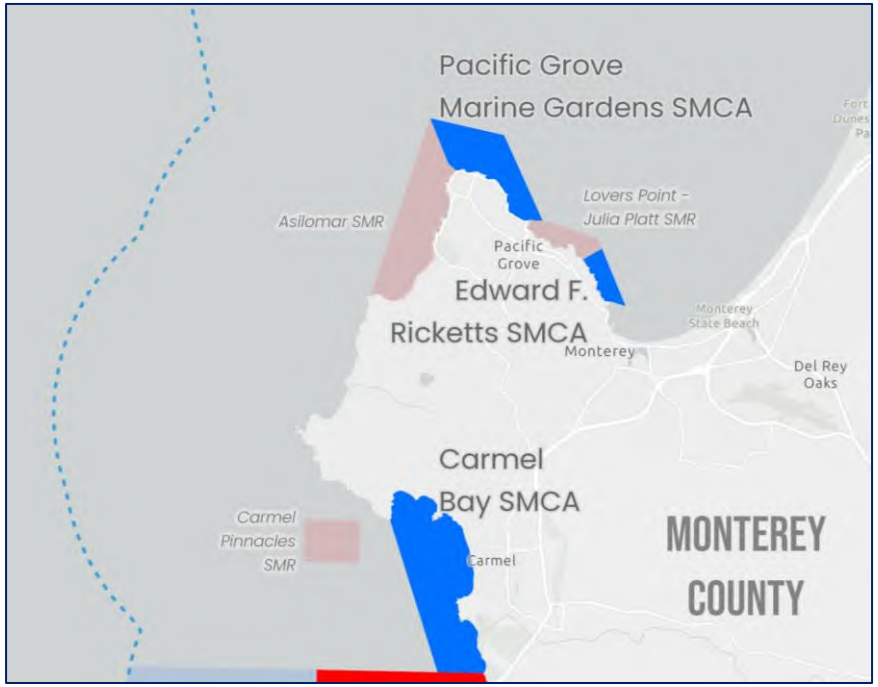
***Non-regulatory**


S. Wertz

2023-23MPA_1, 6, and 11 For diver safety, prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active.

3 Proposed Actions Affecting:

- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA

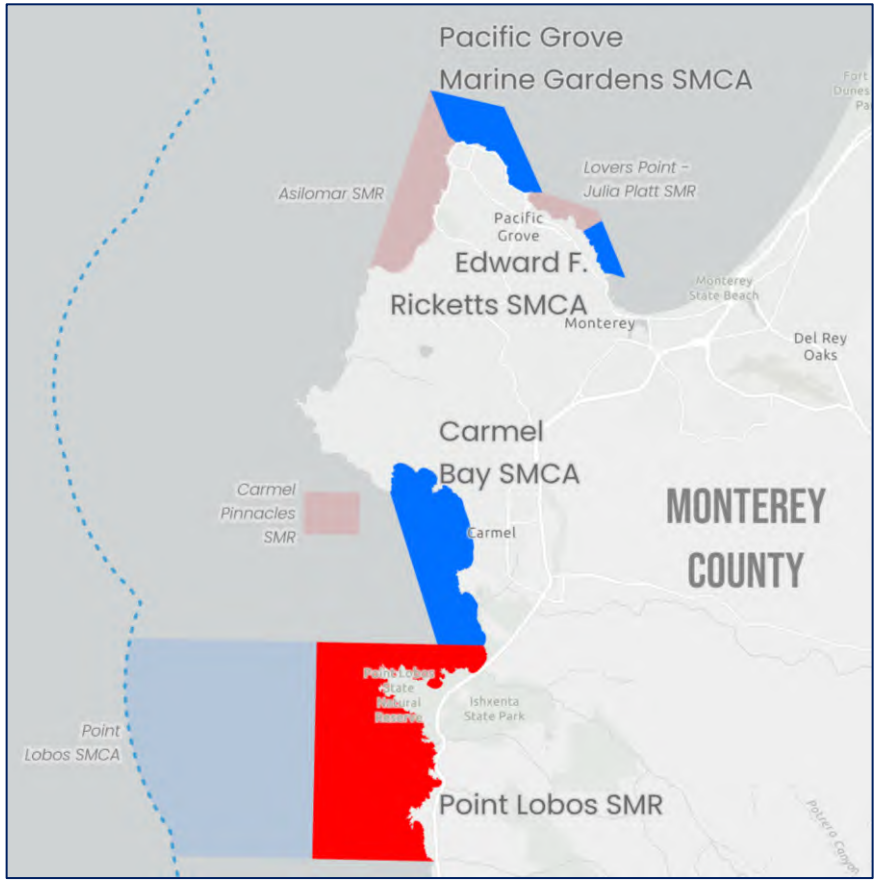


CDFW Recommendation:
DENY 2023-23MPA_1, 6, and 11

2023-23MPA_2, 7, 12, and 16 Allow unlimited recreational take of urchin.

4 Proposed Actions Affecting:

- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA
- Point Lobos SMR

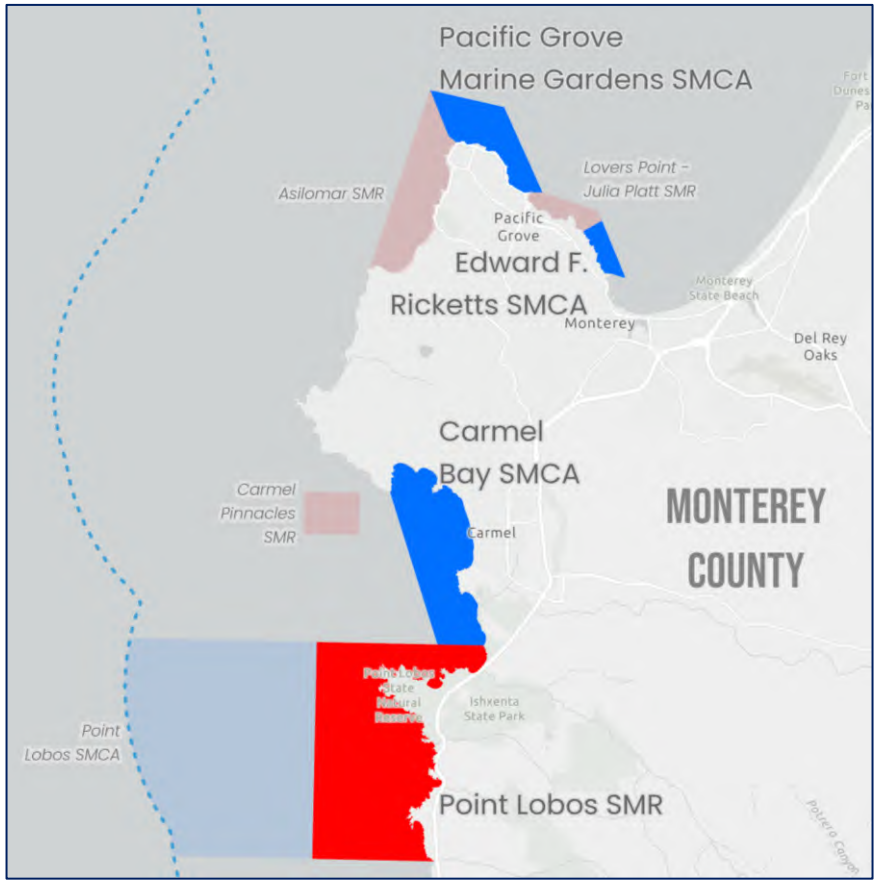


CDFW Recommendation:
DENY 2023-23MPA_2, 7, 12, and 16

2023-23MPA_3, 4, 5, 8, 9, 10, 13, 14, 15, 17, 18, and 19: Allow out-planting of kelp on the reef, spore dispersal by sporophyte bags, and pruning kelp canopy to promote growth and resilience to storms without an SCP.

12 Proposed Actions Affecting:

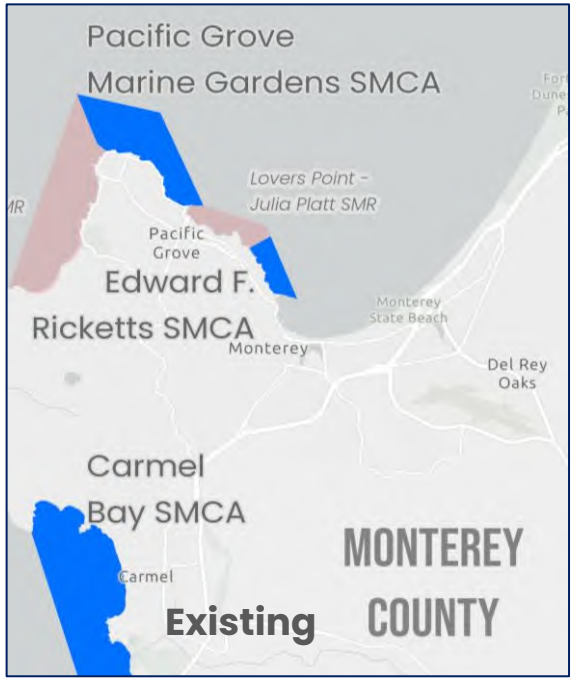
- Edward F. Ricketts SMCA
- Pacific Grove Marine Gardens SMCA
- Carmel Bay SMCA
- Point Lobos SMR

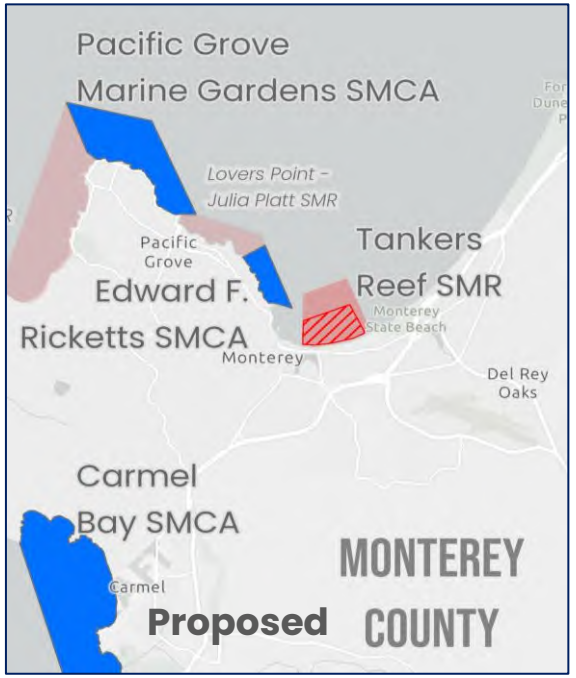


CDFW Recommendation:
DENY 2023-23MPA_3-5, 8-10, 13-15, and 17-19

2023-23MPA_20_AM1: Establish New SMR at Tanker's Reef.

Summary of Proposed Action: Establish New SMR at Tanker's Reef near Monterey (covering 193 acres, or 0.3 sq miles)





CDFW Recommendation:
DENY 2023-MPA_20_AM1

2023-23MPA_26: Allow commercial urchin harvest in MPAs for restoration.

Summary of Proposed Action:

Allow commercial urchin harvest in MPAs for kelp restoration.



CDFW Recommendation:
DENY 2023-23MPA_26

2023-23MPA: Proposed Actions 21, 22, and 24_AM1

Summary of Proposed Actions:

21. Create regulatory pathway to allow placing of artificial reef structures and sunken ship for recreational diving.

22. Allow the placement of seasonal mooring buoys in permitted restoration areas including MPAs.

24_AM1. Establish an approval process within CDFW's SCP program to grant permits of up to ten years for urchin removal and kelp restoration within MPAs.

CDFW Recommendation:
DENY 2023-23MPA_21

CDFW Recommendation:
DENY 2023-23MPA_22

CDFW Recommendation:
DENY 2023-23MPA_24_AM1

2023-23MPA: Proposed Actions 25 and 27

Summary of Proposed Actions:

25. Consider proposed kelp restoration sites as Giant Giant Kelp Restoration adopted reefs for continued kelp restoration.

27. Grant commercial urchin divers an exemption to Wanton Waste Rule to allow for take of un-marketable urchins while participating in kelp restoration and/or allow commercial divers to take urchin under recreational rules.

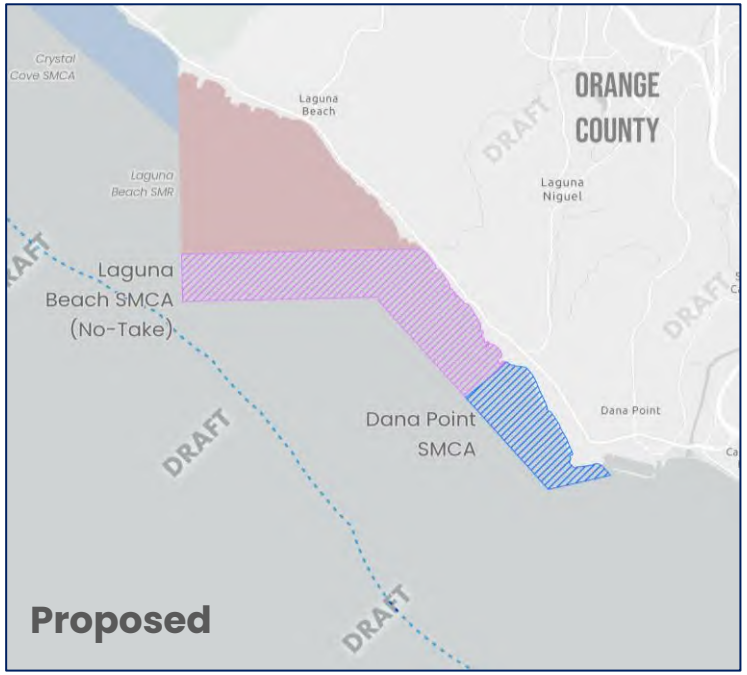
CDFW Recommendation:
DENY 2023-23MPA_25

CDFW Recommendation:
DENY 2023-23MPA_27

2023-24MPA_AM: Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach.

Summary of Proposed Action: Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach, which will require modification of the northern boundary of Dana Point SMCA (modified boundaries as amended).





CDFW Recommendation:
DENY 2023-24MPA_1_AM1

2023-27MPA_AM: Amend existing Anacapa Island SMCA or Special Closure to Protect Eelgrass While Allowing for Community Access.

Summary of Proposed Action:

Amend existing Anacapa Island SMCA or Special Closure, evaluating three options (solutions) and choose the one that best protects the eelgrass meadow while allowing for community access.



2023-27MPA_AM1_1: Select best of three options to amend existing Anacapa Island SMCA or Special Closure to protect the eelgrass meadows and allow community access.

3 Petitioner Proposed Options:

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

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

iii. Change the border of the Anacapa Island Special Closure, prohibiting the deployment of lobster traps in waters from 0-30 meters (0-98.43 feet) deep instead of the existing 0-6.1 meters (0-20 feet) deep off Anacapa Island.



CDFW Recommendation: DENY all options 2023-27MPA_AM1_1

2023-32MPA: Reclassify Duxbury Reef SMCA to an SMR and Expand the Southern and Northern Boundaries

Summary of 3 Proposed Actions:

1. Reclassify Duxbury Reef SMCA to an SMR to prohibit take.
2. Expand Duxbury Reef MPA by extending the southern boundary to encompass the southern portion of the reef
3. Expand Duxbury Reef MPA by extending the northern boundary to Double Point/Stormy Stack Special Closure.



CDFW Recommendation:
DENY 2023-32MPA_1;
GRANT in Concept 2023-32_2, 3

2023-33MPA_AM: Expand Boundaries of Cabrillo, Natural Bridges, Point Conception, South Point, and Gull Islands SMRs, Point Dume SMCA, Add Take at Point Dume SMCA, and Add a New SMCA at Pleasure Point

7 Proposed Actions:

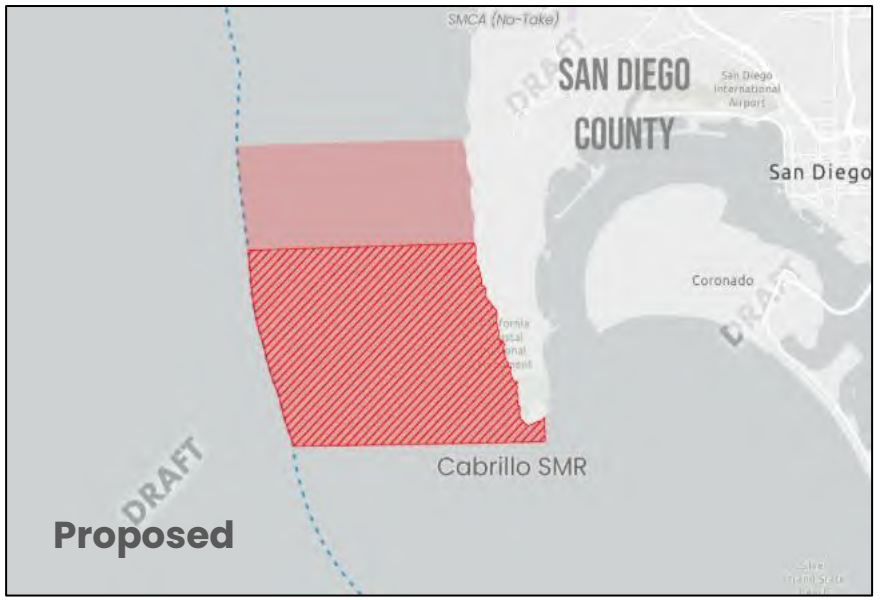
1. Expand Cabrillo SMR ~9.99 sq. miles
2. Expand Point Dume SMCA ~4.6 sq. Miles, Add Take
3. Expand South Point SMR by 26.3 sq. miles
4. Expand Gull Island SMR by 1.8 sq. miles
5. Expand Point Conception SMR by 14.6 sq. miles
6. Expand Natural Bridges SMR 14.5 sq. miles
7. Designate a New 3.2 sq. mile SMCA at Pleasure Point (Santa Cruz)



2023-33MPA_1_AM1: Expand Cabrillo SMR ~9.99 sq. miles

Summary of Proposed Action: Expand Cabrillo SMR westward (to 3 nautical mile state line) and northward (to New Hope Rock) by ~9.99 sq mi.

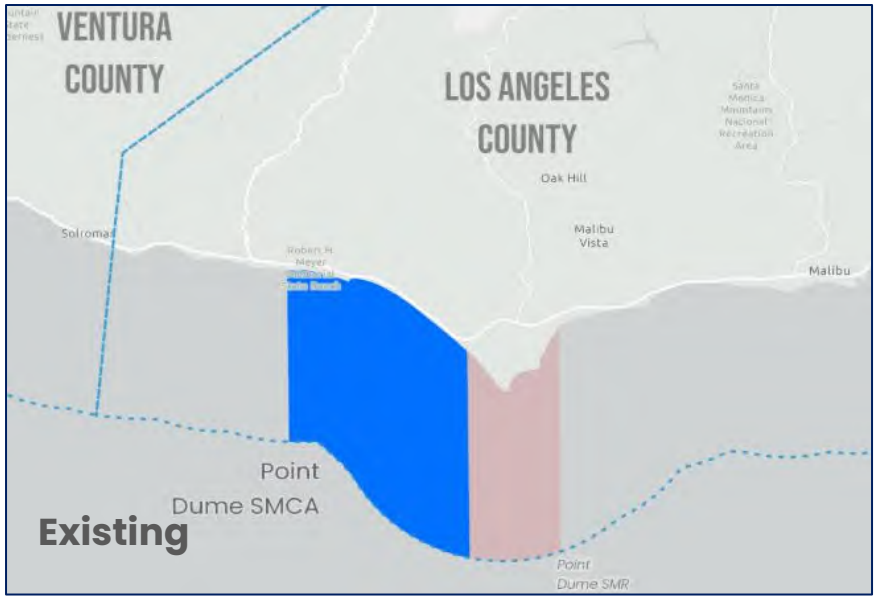




CDFW Recommendation:
DENY 2023-33MPA_1_AM1

2023-33MPA_2_AM1: Expand Point Dume SMCA ~4.6 sq. Miles, Add Recreational Take Allowance From Shore by Hook-and-Line and Spear

Summary of Proposed Action: Expand Point Dume SMCA westward by 4.6 sq mi and add allowance for recreational take from shore by hook-and-line and spearfishing.



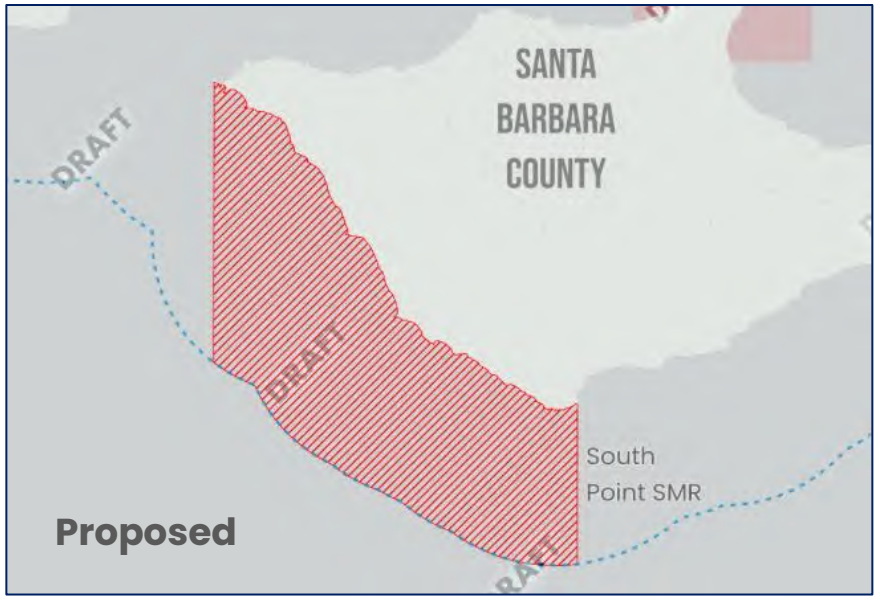


CDFW Recommendation:
DENY 2023-33MPA_2_AM1

2023-33MPA_3: Expand South Point SMR by 26.3 sq. miles

Summary of Proposed Action: Expand South Point SMR westward by 26.3 sq mi.



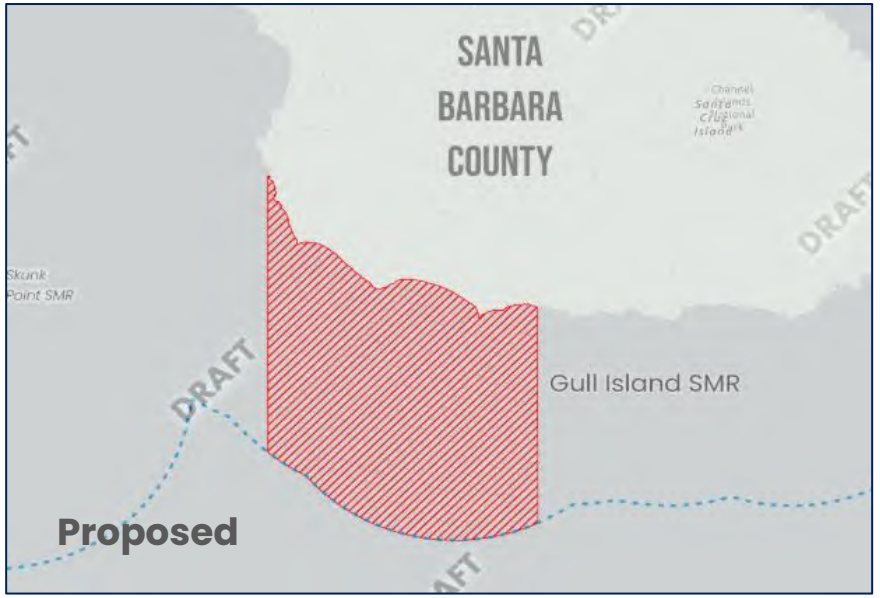


CDFW Recommendation:
DENY 2023-33MPA_3

2023-33MPA_4: Expand Gull Island SMR by 1.8 sq. miles

Summary of Proposed Action: Expand Gull Island SMR northward by 1.8 sq mi.

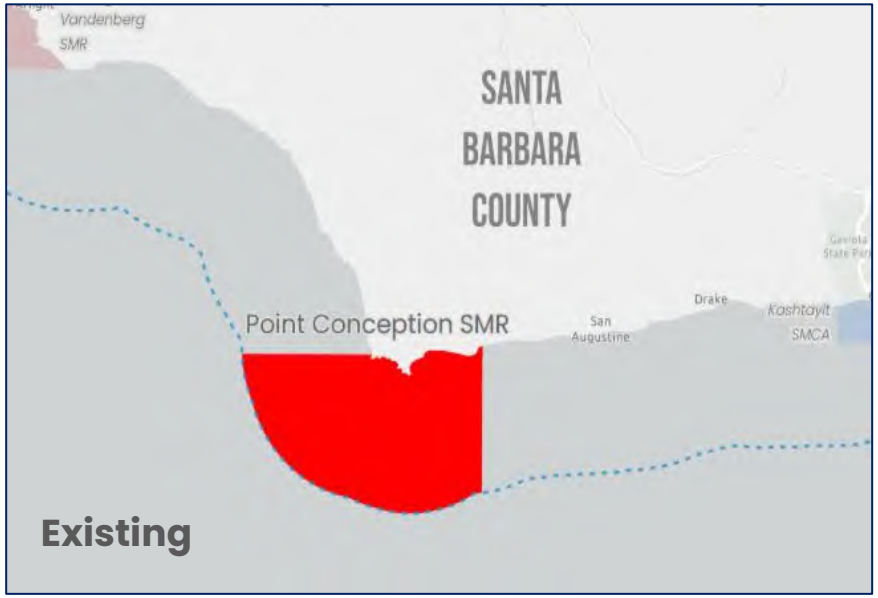


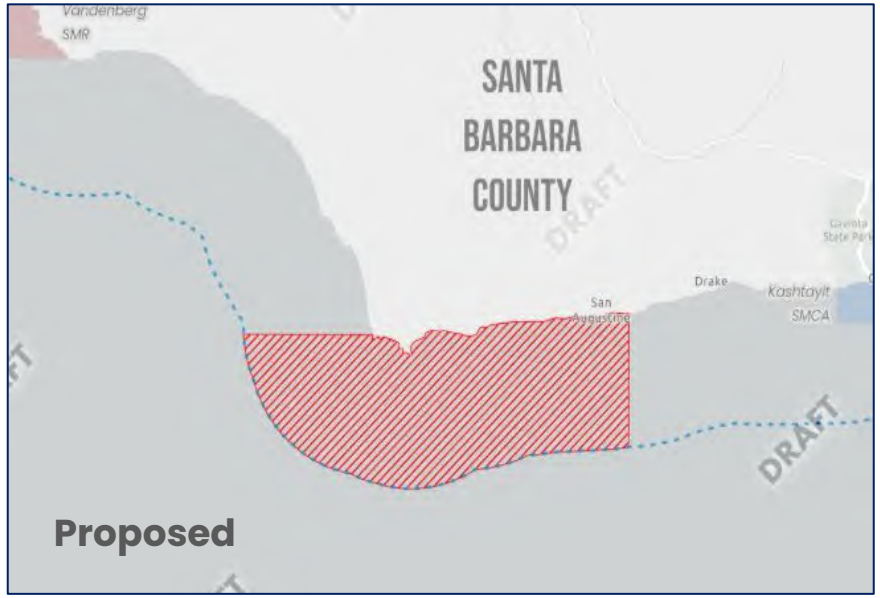


CDFW Recommendation:
DENY 2023-33MPA_4

2023-33MPA_5: Expand Point Conception SMR by 14.6 sq. miles

Summary of Proposed Action: Expand Point Conception SMR eastward by 14.6 sq mi.





CDFW Recommendation:
DENY 2023-33MPA_5

2023-33MPA_6_AM1: Expand Natural Bridges SMR 14.5 sq. miles

Summary of Proposed Action: Expand Natural Bridges SMR southward and eastward to the edge of Natural Bridges State Beach by ~14.5 sq mi.



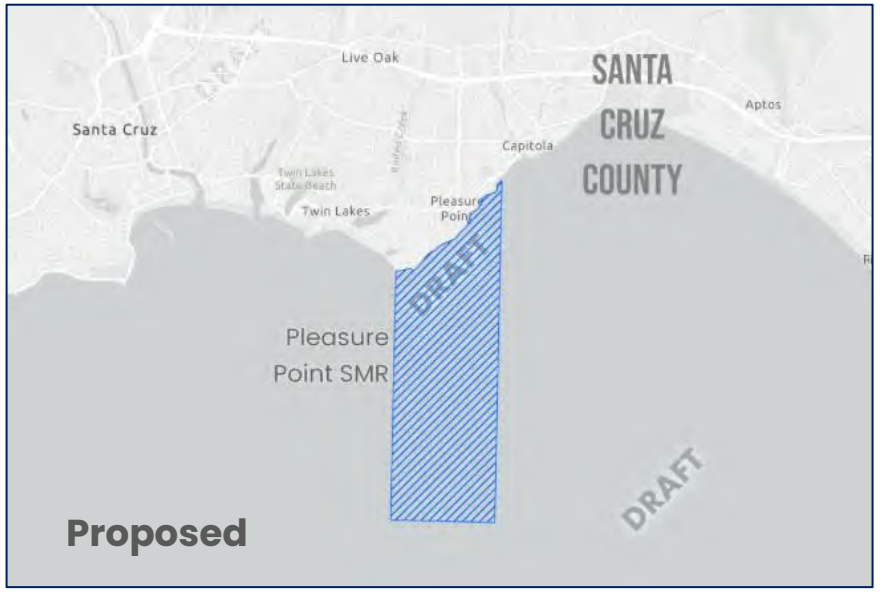


CDFW Recommendation:
DENY 2023-33MPA_6_AM1

2023-33MPA_7_AM1: Designate a new 3.2 sq mi SMCA at Pleasure Point (Santa Cruz)

Summary of Proposed Action: Designate 3.2 sq mi. as a new SMCA near Pleasure Point (Santa Cruz); allow recreational take from shore by hook-and-line and spearfishing only.





CDFW Recommendation:
DENY 2023-33MPA_7_AM1

2023-34MPA: Reclassify Point Buchon SMCA to an SMR and Limit Allowable Uses at Farnsworth Onshore and Offshore SMCAs to Recreational Spearfishing

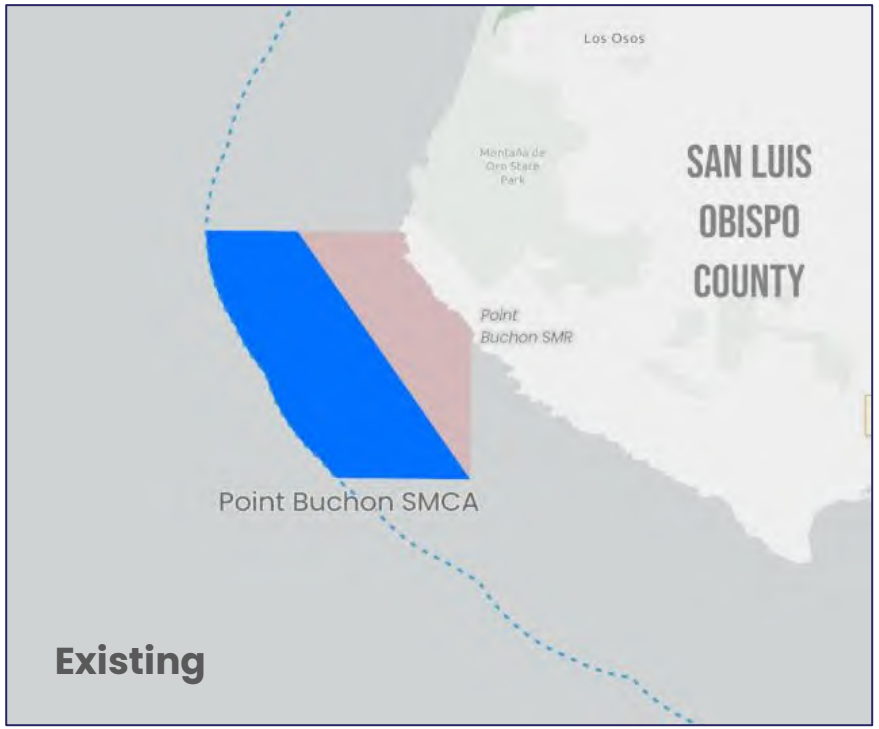
3 Proposed Actions:

1. Reclassify Point Buchon SMCA to an SMR.
2. Limit Allowable Uses Farnsworth Onshore SMCA to Recreational Spearfishing.
3. Limit Allowable Uses Farnsworth Offshore SMCA to Recreational Spearfishing.



2023-34MPA_1: Reclassify Point Buchon SMCA to an SMR

Summary of Proposed Action: Reclassify Point Buchon SMCA to an SMR to prohibit take.





CDFW Recommendation:
DENY 2023-34MPA_1

2023-34MPA_2-3: Change Farnsworth Onshore and Offshore SMCAs regulations to allow only recreational spearfishing

Summary of Proposed Actions:

Change regulations to allow only recreational spearfishing within Farnsworth Onshore and Offshore SMCA boundaries.

Existing regulations:

Offshore SMCA: allows recreational take of pelagic finfish by *hook-and-line or spearfishing*; commercial take of coastal pelagic species by round-haul net, brail gear, and light boat; and swordfish by harpoon

Onshore SMCA: allows recreational take of pelagic finfish by *spearfishing only*

Both MPAs: allows recreational take of market squid by hand-held dip net; white seabass by spearfishing; and marlin, tuna and dorado by trolling



Existing and Proposed

CDFW Recommendation:
DENY 2023-34MPA_2-3

Next Steps

- Five Tribally-led petitions: Discussed at April 14 CFGC TC
- Upcoming Regional Petition Discussion Meetings:
  - **April 21**, **San Mateo** Elks Lodge, Del Norte through Monterey counties
  - **May 5-6**, **Goleta** Hilton Garden Inn, San Luis Obispo through Santa Barbara counties
  - **May 19**, **San Clemente** Holiday Inn Express, Los Angeles through San Diego counties, including Santa Catalina Island
- For more information about regional meetings: fgc.ca.gov/Meetings/2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Recap: DMR Adaptive Management Recommendations

Near-Term (ongoing – 2 years)

- Rec 1: Improve state agencies tribal engagement
- Rec 4: Apply Review knowledge to Network/Management changes
- Rec 7: Expand outreach and education materials
- Rec 9: Continue OPC coordination
- Rec 10: Improve coordination across Management Program pillars
- Rec 11: Update Action Plan
- Rec 16: More targeted outreach to specific audiences
- Rec 17: Improve SCP process
- Rec 18: Use policy to review MPA restoration/mitigation efforts
- Rec 20: Increase enforcement capacity
- Rec 21: Enhance citation record keeping and management
- Rec 25: Implement MPA climate change research
- Rec 27: Improve understanding of MPA effects on fisheries

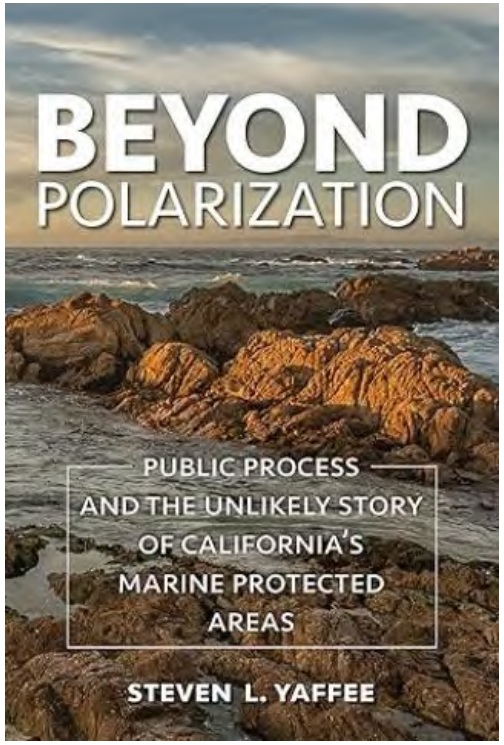
Mid-Term (2 – 5 years)

- Rec 2: Create pathway to tribal MPA management
- Rec 3: Build tribal capacity to participate in MPA management
- Rec 6: Include and fund more diverse researchers and stakeholders
- Rec 8: Evaluate MPA accessibility
- Rec 12: Improve understanding of human dimensions
- Rec 13: Explore innovative technologies
- Rec 14: Develop MPA community science strategy
- Rec 15: Evaluate Outreach needs and resource effectiveness
- Rec 22: Increase knowledge on MPA judicial outcomes
- Rec 23: Examine MPA Network design attribute more effectively
- Rec 26: Consider climate change in human dimensions monitoring
- Rec 28: Integrate influencing factors into MPA performance evaluations

Long-Term (5- 10 years)

- Rec 5: Establish targets to meet MLPA goals
- Rec 19: Create MPA Enforcement Plan
- Rec 24: Better incorporate marine cultural heritage into MPA Network

Power of Collaboration



"After almost 100 years on the planet, I now understand the most important place on Earth is not on land, but at sea"

Sir David Attenborough

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

STATE OF CALIFORNIA

FISH AND GAME COMMISSION
MEMORANDUM

DATE: ~~May 29, 2026~~ Updated July 6, 2026 (updates displayed in blue font)

TO: Craig Shuman, Regional Manager, Marine Region
California Department of Fish and Wildlife



CC: California Department of Fish and Wildlife
Meghan Hertel, Director
Chad Dibble, Deputy Director, Wildlife and Fisheries Division
Sarah Fonseca, Tribal Liaison
Samara Maxey, Regional Tribal Coordinator, Marine Region

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

SUBJECT: Actions Proposed for Tribally Led and Co-Led Marine Protected Area Petitions

This memo is intended to transmit to the Department, for evaluation purposes, current descriptions of specific proposed actions in the five tribally led or co-led marine protected area (MPA) petitions under consideration by the Commission.

During its April 14, 2026 meeting, the Commission Tribal Committee received presentations from tribes that are leading or co-leading MPA petitions, during which the tribes described updates or clarifications to their original petitions. The committee recommended that the Commission request the Department move forward with tribally led or co-led petition evaluations based on how the petitions, and individual actions contained within, were presented and described during the April 14 meeting.

At its April 15-16, 2026 meeting, the Commission supported the Tribal Committee recommendation and directed staff to submit to the Department the amended proposed actions for tribally led or co-led MPA petitions. Since the April meeting, the Commission held three regional meetings focused on MPA petitions, during which the five tribally led or co-led petitions were presented and petitioners reaffirmed the specific proposed actions as described on April 14.

Table 1 details the five tribally led or co-led MPA petitions and the specific actions requested in each, including those presented in April and reaffirmed during the regional MPA petition meetings. For clarity, the tribal changes are identified in the third column and petitions are renamed with an amendment number in the fourth column. The Department is asked to evaluate the five petitions consistent with the amendments summarized in the "…Description of Amended Petition Proposed Actions, Effective April 15, 2026" column. The Commission has requested that the Department complete and submit the evaluations to the Commission prior to, and present its recommendations during, the Commission's August 12-13, 2026 meeting.

If you have any questions or concerns, please do not hesitate to contact me directly.

Table 1: Tribally Led or Co-Led Marine Protected Area Petitions, Updated July 1, 2026 (updates displayed in blue font)

Petition Number Tribal Lead or Co-Lead and Co-Sponsor(s)	Description of Petition Proposed Actions (Original 2023 or as Amended 2025)	Tribal Petitioner Changes	Amended Petition Number and Description of Amended Petition Proposed Actions (Effective April 15, 2026)
2023-21MPA Tolowa Dee-ni' Nation	• Amend northern boundary of Pyramid Point State Marine Conservation Area (SCMA) • Remove recreational take of surf smelt • Maintain tribal take exemption for the Tolowa Dee-ni' Nation	No changes proposed • *The Department explained that surf smelt is part of a three-species "true smelt" group (surf, night, and whitebait); because the MPA allows recreational take of the group, it is necessary to remove the recreational allowance for true smelt, not just surf smelt. The Tolowa Dee-ni' Nation does not oppose this change.*	2023-21MPA_AM1 • Amend northern boundary of Pyramid Point SMCA • Remove recreational take of ~~surf~~ true smelt • Maintain tribal take exemption for the Tolowa Dee-ni' Nation
2023-28MPA_AM1~~AM2~~ Natural Resources Defense Council (NRDC) Northern Chumash Tribal Council	• Designate a new SMCA around Point Sal (size: 14.22 square miles with an alongshore span of 3.20 miles) • Identify a tribal name through consultation with Chumash people • Allow recreational take of finfish by hook and line from shore	• *Add Northern Chumash Tribal Council as co-petitioner* • *Move the southern boundary northward by approximately one-half mile to end of Vandenberg Space Force Base Road.* *SW corner: 34.895212665° N Lat, 120.731972573° W Long* *SE corner: 34.895212665° N Lat, 120.642637239° W Long* • *Allow incidental take during mission-critical operations at Vandenberg Space Force Base*	2023-28MPA_AM2 • Northern Chumash Tribal Council added as co-petitioner • Designate a new SMCA around Point Sal (size as amended: 9.18 square miles with an alongshore span of 4.03 miles) • Identify a tribal name through consultation with Chumash people • Allow recreational take of finfish by hook and line from shore • Allow incidental take during mission-critical operations at Vandenberg Space Force Base

Petition Number **Tribal Lead or Co-Lead and Co-Sponsor(s)**	**Description of Petition Proposed Actions (Original 2023 or as Amended 2025)**	**Tribal Petitioner Changes**	**Amended Petition Number and Description of Amended Petition Proposed Actions (Effective April 15, 2026)**
2023-29MPA_AM1 NRDC Santa Ynez Band of Chumash Indians Environmental Defense Center	• Designate a new marine protected area near Carpinteria as "Mishopshno SMCA" (size: 8.97 square miles) • Allow recreational take of finfish by hook and line from shore • Include a tribal take exemption for the Santa Ynez Band of Chumash Indians	• *Move western boundary to align with Caspia Lane in Summerland, at:* *34.366106° N Lat, 119.53689° W Long* • *Move the eastern boundary to align with Franklin Creek, at:* *34.366106° N Lat, 119.58868° W Long*	2023-29MPA_AM2 • Designate a new marine protected area near Carpinteria as "Mishopshno SMCA" (size as amended: 9.05 square miles with an alongshore span of 3.63 miles) • Allow recreational take of finfish by hook and line from shore • Include a tribal take exemption for the Santa Ynez Band of Chumash Indians
2023-19MPA Santa Ynez Band of Chumash Indians	• Designate a new marine protected area near Morro Bay as "Chitqawi SMCA" • Include a tribal take exemption for the Santa Ynez Band of Chumash Indians • Allow recreational take of finfish and invertebrates except mussels and scallops by hand • Allow incidental take from permitted operations	• *Remove proposed allowance for recreational take of finfish and invertebrates except mussels and scallops by hand* • *Remove incidental take allowance*	2023-19MPA_AM1 • Designate a new marine protected area near Morro Bay as "Chitqawi SMCA" • Include only a tribal take exemption for the Santa Ynez Band of Chumash Indians

Petition Number Tribal Lead or Co-Lead and Co-Sponsor(s)	Description of Petition Proposed Actions (Original 2023 or as Amended 2025)	Tribal Petitioner Changes	Amended Petition Number and Description of Amended Petition Proposed Actions (Effective April 15, 2026)
2023-20MPA Santa Ynez Band of Chumash Indians	• Expand northern boundary of Point Buchon State Marine Reserve (SMR) north to align with Point Buchon • Re-name Point Buchon SMCA as the "Chumash Co-Managed SMCA" • Remove current take allowance (recreational and commercial take of salmon and albacore) • Add allowance for recreational take of finfish and invertebrates except mussels and scallops by hand • Allow take incidental to operations in MPA • Add a tribal take exemption for the Santa Ynez Band of Chumash Indians	• *Keep current take allowance (recreational and commercial take of salmon and albacore)* • *Remove proposed allowance for recreational take of finfish and invertebrates except mussels and scallops by hand* • *Remove proposed allowance for take incidental to operations in MPA*	2023-20MPA_AM1 • Expand northern boundary of Point Buchon SMR north to align with Point Buchon • Re-name Point Buchon SMCA as the "Chumash Co-Managed SMCA" • Add a tribal take exemption for the Santa Ynez Band of Chumash Indians

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

MEMORANDUM

Date: July 30, 2026

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

From: Craig Shuman, D. Env.
Marine Regional Manager

Subject: **CDFW 2023 MPA Bin 2 Petition Evaluations for the Five Tribally-led Petitions**

At its February 14-15, 2024 meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to the California Department of Fish and Wildlife (CDFW) for review, evaluation, and recommendation. CDFW completed the Evaluations and Recommendations for the ten Bin 2 non-Tribally-led petitions and the Companion Document in March of 2026, which were received by CFGC at their April 15-16, 2026 meeting.

At the December 9, 2025 meeting, the CFGC Tribal Committee requested that before releasing the Tribally-led petition evaluations, CDFW engage with the tribes leading or co-leading petitions and provide an update on the engagement and any clarifications on the petitions at the April 14, 2026 CFGC Tribal Committee meeting.

At the April 14, 2026, CFGC Tribal Committee meeting, tribal representatives provided an overview and clarifications for the five Tribally-led petitions. CDFW presented an update on tribal outreach and engagement since December, and summarized the clarifications and proposed amendments for the Tribally-led petitions. At the meeting on April 15, 2026, the CFGC Tribal Committee recommended to CFGC that CDFW evaluate the Tribally-led petitions according to the proposed amendments and clarifications discussed during the Tribal Committee meeting on April 14. CFGC subsequently referred the amended petitions Tribally-led petitions to CDFW for evaluation and reaffirmed the evaluations should be completed using the Evaluation Framework approved by CFGC in August 2025.

CDFW has completed and is transmitting the evaluations and recommendations for the five Tribally-led petitions (Attachments 1-5). The Companion Document (Attachment 6) was updated with new information that includes a detailed timeline of the 2023 MPA Petition milestones, updates related to tribal outreach and engagement, a new section on Climate Resilience and MPAs, and additional supplemental information for Question 5 (information gaps) and Question 9 (MPA Network design and levels of protection) of the evaluation. The Companion Document should be read in

advance of the petition evaluations as it includes supplemental information and additional context that is relevant for all the evaluations. CDFW also developed a Science Guide to California's MPA Network (Attachment 7). This document includes a summary of the Science Guidelines developed and applied during the MPA planning process, and a current assessment of how the network conforms to these Science Guidelines.

If you have any questions or need more information, please contact me at r7regionalmgr@wildlife.ca.gov.

Attachment 1: CDFW Evaluation and Recommendations for **2023-19MPA_AM1**: Designate a New Chitqawi SMCA near Morro Bay with a Tribal Exemption for Santa Ynez Band of Chumash Indians

Attachment 2: CDFW Evaluation and Recommendations for **2023-20MPA_AM1:** 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

Attachment 3: CDFW Evaluation and Recommendations for **2023-21MPA_AM1:** Remove Recreational Take of True Smelt and Change the Boundary at Pyramid Point SMCA

Attachment 4: CDFW Evaluation and Recommendations for **2023-28MPA_AM2:** Designate a New SMCA Near Point Sal with an Allowance for Recreational Take of Finfish by Hook-and-Line From Shore

Attachment 5: CDFW Evaluation and Recommendations for **2023-29MPA_AM2:** Designate a New SMCA Near Mishopshno/Carpinteria with an Allowance for Recreational Take of Finfish by Hook-and-Line from Shore and a Tribal Take Exemption for Santa Ynez Band of Chumash Indians

Attachment 6: CDFW's 2023 Decadal Management Review Marine Protected Area Petition Evaluation Updated Companion Document, July 2026 Version

Attachment 7: CDFW Science Guide to California's MPA Network

ec: Meghan Hertel, Director
California Department of Fish and Wildlife

Chad Dibble, Deputy Director
Wildlife and Fisheries Division

Kevin Thomas, Deputy Director
Regional Operations

Jaimie Huynh, Deputy Director
Strategic Engagement, Equity and Partnerships

Nathaniel Arnold, Chief
Law Enforcement Division

Eric Kord, Assistant Chief
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Wendy Bogden, General Counsel
Office of General Counsel

Claire Waggoner, Marine Region Habitat
Conservation Program Manager
Marine Region

Erica Mason, Statewide Marine Protected Area
Management Project Supervisor
Marine Region

Jenn Eckerle, Deputy Secretary for Ocean and
Coastal Policy Natural Resources Agency

California Department of Fish and Wildlife

SCIENCE GUIDE TO CALIFORNIA'S MPA NETWORK



CALIFORNIA MARINE PROTECTED AREAS

July 2026

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MPA PLANNING PROCESS SCIENCE FOUNDATION

In 2012, California made history by establishing the largest ecologically connected network of marine protected areas (MPAs) in the world. This document provides an overview of the scientific guidelines used during the Marine Life Protection Act (MLPA) Initiative planning process to design California's MPA Network and their utility in informing adaptive management and evaluation of MPAs today, as well as an analysis of the existing MPA Network's conformance to the scientific guidelines using the most recent habitat data available. This is a living document, intended to be updated periodically to reflect the best available science.

MPA NETWORK IMPLEMENTATION

MPAs are spatially defined marine or estuarine areas that restrict certain human activities to protect the ecosystems contained within. California's MPAs are in state waters, which extend from the mean high tide line to the offshore limit (generally 3 nautical miles from shore) and include bays and estuaries. Each MPA has its own set of regulations, ranging from fully protected No-take marine reserves to areas where certain consumptive activities, such as fishing for specific species, are allowed (Table 1). MPAs do not limit non-consumptive activities, such as swimming, kayaking, wildlife viewing, or spiritual practices. Special closures are an additional type of marine managed area that prohibit human access year-round or seasonally to protect seabird or marine mammal populations.



MPA regulations sign at Lover's Cove SMCA. (K. Gonzales)

Table 1. Overview of marine managed area classifications used in California's MPA Network, including definitions and quantitative summary of protection levels, including map symbology and allowable uses for each designation.

Map Color	Classification	Number	% of State Waters	Description
	State Marine Reserve	49	9.0	An MPA classification that prohibits damage or take of all marine resources (living, geologic, or cultural), including recreational and commercial take.
	State Marine Conservation Area (No-take)	10	0.6	An MPA classification that generally prohibits the take of living, geologic, and cultural marine resources, but allows potentially affected and ongoing permitted activities such as dredging and maintenance to continue.
	State Marine Conservation Area	60*	6.5	An MPA classification that may allow some recreational and/or commercial take of marine resources (restrictions vary)
	State Marine Recreational Management Area	5	0.1	A marine managed area classification that limits recreational and commercial take of marine resources while allowing for legal waterfowl hunting to occur; provides subtidal protection equivalent to an MPA (restrictions vary)
	State Marine Park	1*	<0.1	An MPA classification that prohibits damage or take of any marine resources for commercial purposes (restrictions vary)
	Special Closure	14	0.1	An area designated by the California Fish and Game Commission that prohibits access or restricts boating activities in waters adjacent to sea bird rookeries or marine mammal haul-out sites (restrictions vary)

*The California Fish and Game Commission designated Cambria State Marine Conservation Area, which was subsequently adopted as Cambria State Marine Park by the State Park and Recreation Commission with the same boundaries and no change to regulations. Therefore, this MPA has dual designations and is counted twice in the table. See Title 14, § 632 of the California Code of Regulations for specific MPA regulations.

The MLPA, passed in 1999, required California to redesign its existing collection of MPAs into a cohesive network based on the best available science and local knowledge. To guide development of the MPA Network, the law specified six goals focused on protecting marine ecosystems, supporting human uses, and strengthening long-term management (Table 2).

California's MPAs are unique because they were intentionally designed to function as an ecologically connected network rather than as isolated protected areas.

Table 2. Goals of the California Marine Life Protection Act.

	Goal 1: Protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems.
	Goal 2: Help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted.
	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.
	Goal 4: Protect marine natural heritage, including protection of representative and unique marine life habitats in California waters for their intrinsic value.
	Goal 5: Ensure California's MPAs have clearly defined objectives, effective management measures, and adequate enforcement, and are based on sound scientific guidelines.
	Goal 6: Ensure the state's MPAs are designed and managed, to the extent possible, as a network.

The design of the MPA Network was rooted in Science Advisory Team (SAT) recommendations prioritizing individual MPA size and spacing to maintain critical ecological connections. By strategically placing MPAs along the coast, the MPA Network protects a full range of habitats to support higher biodiversity.

The SAT's recommendations provided the scientific foundation for an eight-year iterative planning process that relied on rigorous scientific analysis, extensive public engagement, and collaboration across a variety of perspectives. This effort culminated in 2012 when the MPA Network was fully implemented statewide, becoming the first ecologically connected MPA network of its kind in the United States (Figure 1).



Fort Bragg coast at sunset. (K. Gonzales)

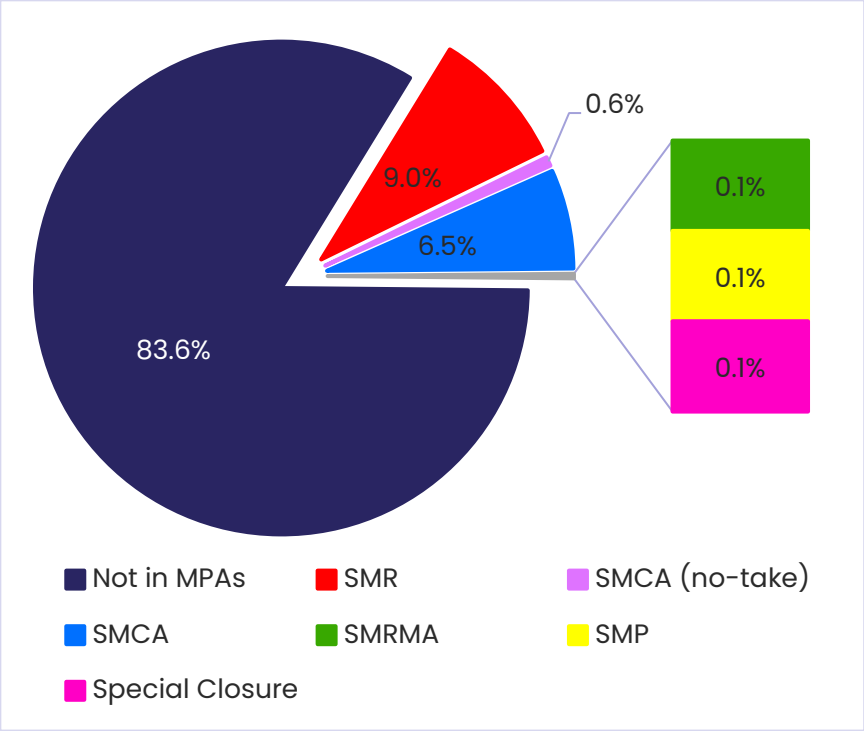


Figure 1. Percent of California state waters protected within the MPA Network, by MPA classification. The MPA Network includes 124 MPAs and 14 special closures spanning the entire California coastline and encompassing 16.2% of state waters. More than half of these protected waters are contained in fully protected No-take State Marine Reserves.

MONITORING AND ADAPTIVE MANAGEMENT

Monitoring of these areas and nearby reference areas began in 2007 to establish ecological baselines and it continues today to evaluate MPA performance and how marine species and ecosystems respond to MPA protection. Monitoring studies include surveys of fish, invertebrates, habitats, and ocean conditions both inside and outside MPAs, such that the effects of fishing and natural drivers of change can be distinguished. Results from long-term monitoring provide the foundation for evaluating MPA Network performance over time. Adaptive MPA management, required by the MLPA, is informed by this periodic expert scientific evaluation, partner engagement, and review. The goal is to ensure that MPAs can continue to meet their individual and MPA Network-scale objectives in the face of anthropogenic stressors, such as climate change, and natural oceanographic change. Moving forward, the human dimensions of MPA management, seeking to understand how people use, value, and relate to MPAs, will also be monitored and evaluated as part of MPA Network adaptive management (DMR Priority Recommendation #12).

Today, responsibility for maintaining the integrity of the MPA Network is shared at the state level. The California Department of Fish and Wildlife (CDFW) serves as the lead managing agency for MPAs, the California Fish and Game Commission holds regulatory authority for the MPA Network, and the Ocean Protection Council provides statewide MPA policy leadership and funding for essential research and monitoring. CDFW works in partnership with state and federal agencies, California Native American Tribes (tribes), community partners, researchers, and more across four core programmatic pillars: outreach and education, enforcement and compliance, policy and permitting, and research and monitoring.

FOUNDATIONAL DOCUMENTS AND REPORTS[1]

- Master Plan for MPAs, CDFW (2008, 2016): Initially developed to guide regional MPA design during the MLPA Initiative planning process (2008), and later revised to reflect a shift to statewide management of the MPA Network as a whole (2016)

[1] MLPA Initiative documents, including regional SAT methodologies on which this guide is based, are available upon request.

- MPA Monitoring Action Plan, CDFW (2018): Guides long-term ecological monitoring of the MPA Network to inform adaptive management and lays the groundwork for a Network-wide evaluation framework
- Climate Resilience and California's Marine Protected Area Network, Climate Resilience Working Group (2021): Provides an overview of climate change impacts to California's coastal and marine ecosystems, explores mechanisms by which MPA designation may confer resilience to climate change, and offers recommendations for research and investment
- Science Guidance for Evaluating California's Marine Protected Area Network, Decadal Evaluation Working Group (2021): Provides scientific guidance in support of decadal management reviews of the MPA Network, including performance evaluation questions and metrics, as well as recommendations for filling key information gaps
- A Synthesis of Ecological and Social Outcomes from the California Marine Protected Area (MPA) Network, National Center for Ecological Analysis and Synthesis (NCEAS) Working Group (2022): Integrates a diverse set of long-term monitoring data to evaluate four key aspects of MPA performance against the goals of the MLPA
- Decadal Management Review (DMR), CDFW (2022): The first ever comprehensive evaluation of the entire statewide MPA Network



Bull kelp in shallow water. (E. Pope)

MLPA INITIATIVE PLANNING PROCESS: SCIENCE EVALUATION OF MPA PROPOSALS

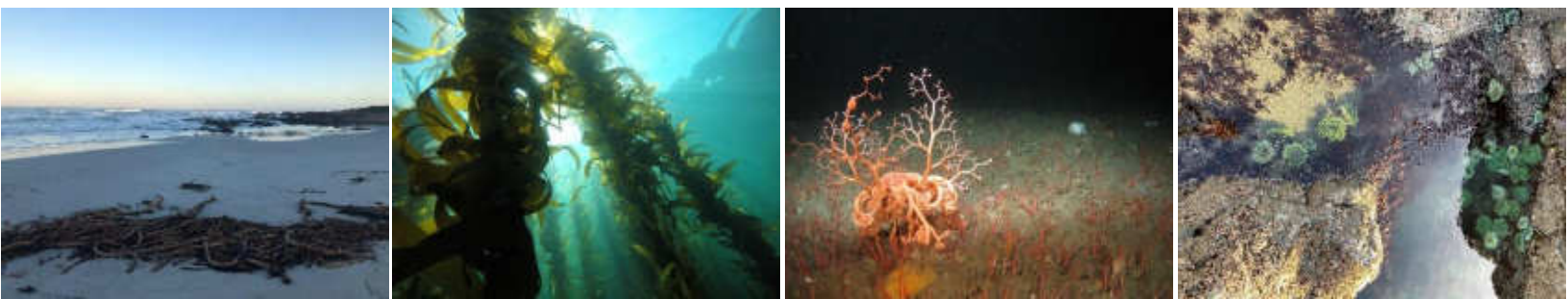
The MPA Network was legislatively mandated (MLPA, Fish & G. Code § 2850 (1999)) to be designed using the best available science and to function as an ecologically connected system (for more information, see Appendix A of the 2016 Master Plan for MPAs). During the MLPA Initiative planning process, the coast was divided into four planning regions to support MPA Network design based on local characteristics and conditions. As prescribed in the 2008 Master Plan, a SAT was convened during each region's individual planning process to develop scientific guidelines for MPA design, evaluate alternative proposals against these guidelines, and provide a scientific perspective if relevant questions arose. The SAT was composed of scientists with expertise in marine ecology, oceanography, fisheries, and socioeconomics, and was responsible for translating scientific knowledge into practical MPA Network design guidance. The SAT operated independently throughout the process and its members did not design or propose MPAs.

For each planning region, science-based guidelines developed by the SAT (hereafter, SAT Science Guidelines) were used by the Regional Stakeholder Groups for iterative MPA array design, and by the SAT to compare and evaluate alternative proposals. The SAT Science Guidelines were linked to the six MLPA goals and ensured that MPA proposals were assessed consistently and objectively. Additional analyses in support of the MLPA planning process were conducted by the SAT, MLPA Initiative staff and contractors, CDFW, and California State Parks.

The SAT Science Guidelines focused on several principles central to building a connected MPA Network:

- Each key marine habitat should be represented, to the extent feasible given uneven distribution of habitats in state waters, in multiple MPAs to protect the diversity of species living in and moving among different habitats. These habitats include rocky reefs, intertidal zones, sandy or soft ocean bottoms, kelp forests, submarine canyons, and seagrass beds.
- The MPA Network should contain multiple examples, or replicates, of each key marine habitat to protect the diverse species and communities occurring across large environmental and geographic gradients. This also helps buffer against loss or local disturbance in any single MPA.
- MPAs should be large enough to protect adult populations, accounting for biological factors such as home range size and movement patterns across depth zones.
- MPAs should be spaced close enough together to allow movement and dispersal of larvae and juveniles between MPAs.

Key marine habitats include beach (K. Gonzales), kelp forest (S. Wertz), deep water soft and hard substrate (CDFW/MARE), and rocky intertidal (E. Pope).



These principles were intentionally precautionary; by incorporating elements such as replication, connectivity, and spatial distribution, the MPA Network was designed to protect biodiversity and support ecosystem resilience under uncertain and changing environmental conditions stemming from both natural disturbances and broader ocean stressors. Fundamental to the success of incorporating these principles was adherence to guidance from the 2008 Master Plan, particularly that the array of MPAs in each region include No-take marine reserves that met size and spacing criteria to function as the 'backbone' of a connected MPA Network.

The four regional planning efforts were integrated into a single statewide MPA Network once the final regional networks of MPAs were adopted by the California Fish and Game Commission in 2012. Following the MPA Network's implementation, the focus moved from regional planning to statewide adaptive management. This was reflected in a shift from baseline monitoring at the planning region level to long-term monitoring scaled to bioregions (Figure 2). These bioregions reflect large-scale distinctions in biota, ecological communities, and key habitats, and help contextualize ongoing monitoring and evaluation of the MPA Network.



Figure 2. Map of the three bioregions defined in the MPA Monitoring Action Plan, delineated by distinct changes in ecological communities: North (California/Oregon border to San Francisco Bay, including the Farallon Islands), Central (San Francisco Bay to Point Conception), and South (Point Conception to the California/Mexico border, including the Channel Islands). These bioregions were identified based primarily on patterns observed in baseline monitoring data.

LEVELS OF PROTECTION

The MPA Network was designed to bolster ecological goals while still supporting a variety of human uses. To achieve this, MPAs were established with different classifications that restrict some or all consumptive uses (Table 1). For example, some MPAs are fully protected No-take State Marine Reserves (SMRs) that prohibit all extractive activities. These areas provide the highest level of ecological protection. Other classifications, namely State

Marine Conservation Areas (SMCAs) and State Marine Parks (SMPs), allow certain forms of take[2] to accommodate specific uses while still contributing to the goals of the MLPA. The regulations in these partial-take MPAs are specific to the objectives of the individual MPA and therefore vary by MPA; consequently, even though they share a designation, two SMCAs may permit very different take allowances.

This limited set of MPA classifications provided both simplicity and flexibility during the regional planning processes. At the same time, it created a challenge in comparing alternative MPA proposals. The types of fishing gear and extractive activities allowed within an MPA can influence the marine ecosystem in different ways depending on the species targeted, methods used, and habitats affected. As a result, two arrays of MPAs with otherwise similar numbers, sizes, and types of MPAs could markedly differ in their overall conservation value depending on the specific activities allowed within each proposed MPA.

To address this challenge, the SAT developed the Level of Protection (LOP) framework to assess an MPA's overall contribution to broader ecosystem protection goals given differing allowed uses (Figure 3). The framework was used to assign one of six[3] values (Low, Moderate-low, Moderate, Moderate-high, High, and Very High) to extractive activities based on their potential ecological impacts. This approach helped facilitate comparisons among MPA proposals and gauge a proposed array's likelihood of achieving the ecological goals of the MLPA, such as habitat and biodiversity protection.

Activities expected to have greater impacts on marine ecosystems received lower LOPs, while less permissive MPAs received higher LOPs. In developing LOPs, the SAT incorporated an assessment of both direct impacts (such as removal of target species, incidental take of non-target species, or habitat alteration resulting directly from the gear used) and indirect impacts (such as changes to food webs, community structure, or ecosystem function resulting from species removal) of an activity[4].



Warty sea cucumber in Scorpion SMR. (A. Van Diggelen)

[2] "Take" means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code § 86)

[3] In the Central Coast, the first of the four study regions, only Very High, High, Moderate, and Low LOPs were applied.

[4] "Activity" refers to the take of a particular species, by a particular method, at a particular range of depths. The SAT acknowledged that other extractive or ecosystem-altering activities could affect ecosystem condition; however, these non-fishing activities were not incorporated into the SAT LOP framework because the impacts were difficult to quantify.

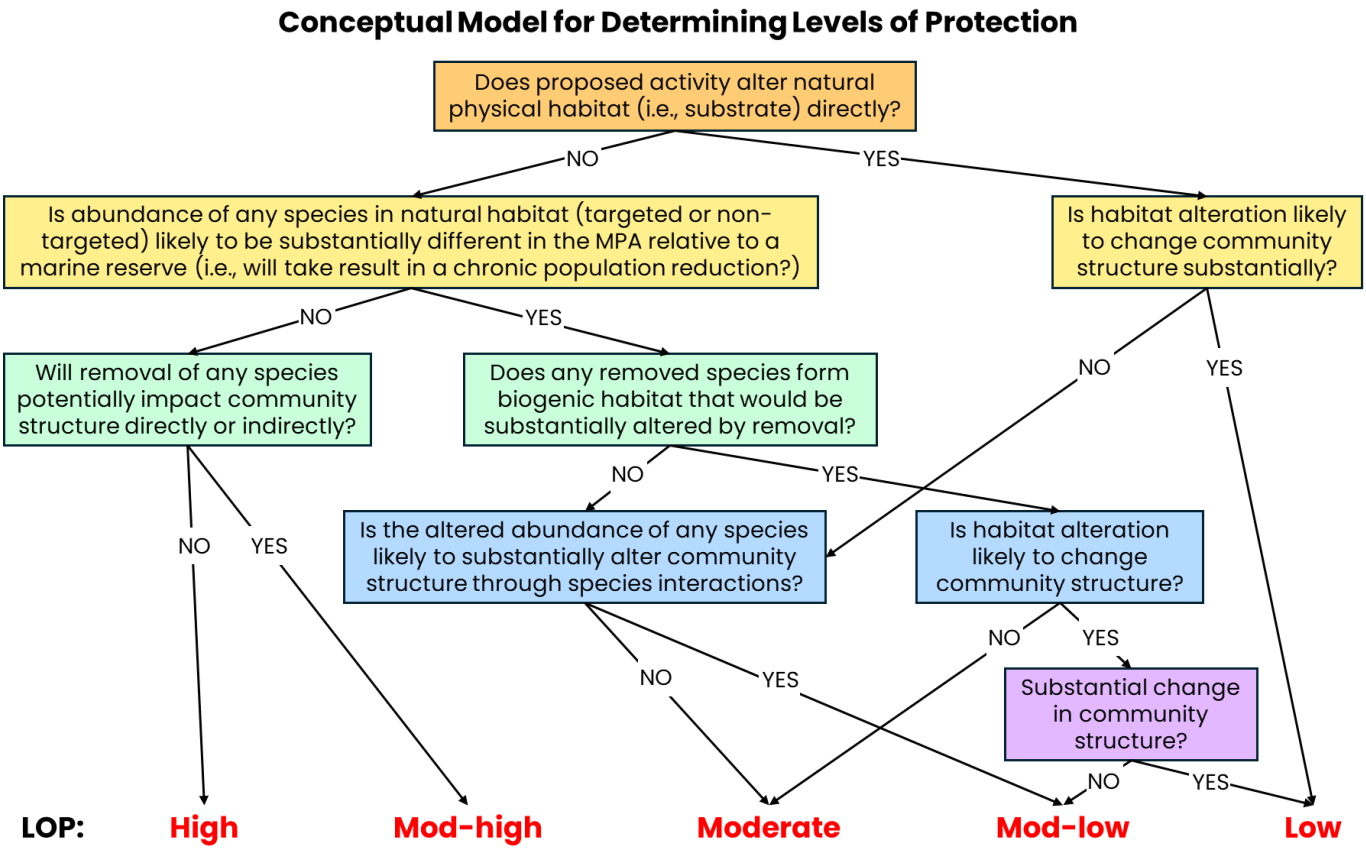


Figure 3. Conceptual model used by the SAT during the California MLPA Initiative planning process to assign an MPA's Level of Protection (LOP) based on proposed extractive activities (figure recreated from the SAT's Methods Used to Evaluate MPA Proposals in the MLPA North Coast Study Region). State Marine Reserves, which are No-take MPAs, were automatically assigned a Very High LOP (not shown here).

LOPs were developed by the SAT using recreational and commercial fishing data from CDFW, supplemented where needed by scientific literature and local knowledge for each planning region. The resultant LOPs were thus highly tailored to the specific fisheries, gear types, and species-habitat interactions in each planning region.

Each proposed MPA was assigned an LOP based on its allowable uses. When multiple extractive activities were proposed within a single MPA, the overall LOP for that MPA corresponded to the activity with the greatest potential ecological impact (i.e., the activity with the lowest LOP).

Conceptually, the framework assessed how much an ecosystem within an MPA might differ from a comparable No-take area if a given extractive activity were allowed. More restrictive MPAs received higher LOPs, whereas MPAs that allowed activities expected to substantially[5] alter species abundance, habitat condition, or community structure relative to a No-take area received lower LOPs. Although MPAs assigned low LOPs likely provide less conservation value than more restrictive MPAs, they may contribute toward achieving other MLPA goals.

[5] A 'substantial' change in the abundance of a species is one that is likely to be persistent and detectable through comparison with a No-take area.

Fishing regulations are implemented at scales larger than individual MPAs, so the actual level and distribution of take within an MPA is inherently uncertain. For this reason, the SAT developed LOPs conservatively based on the potential impacts of an activity occurring at its maximum allowable intensity under existing regulations, rather than on actual fishing effort, stock status, or realized ecological conditions within an MPA. The LOP framework therefore focuses on the certainty that an MPA would achieve the ecological goals of the MLPA regardless of existing or future patterns of take. As a result, an MPA with a High LOP is likely to resemble an unfished system even if allowed activities are locally intense or increase in the future.

This framework provided a transparent, consistent, and stable method for comparing MPA proposals and evaluating their potential contribution to the MLPA's ecosystem protection goals. Barring a few changes to MPA designations and take regulations, LOP designations have remained largely the same since implementation of the MPA Network.

SCIENCE ADVISORY TEAM ANALYSES

In analyzing the proposals for MPA arrays put forward by regional stakeholder groups, the SAT used LOPs in conjunction with other science-based guidelines to evaluate whether MPAs would contribute to Network-scale objectives. Per the principles behind the SAT Science Guidelines, MPAs were required to be of sufficient size to support marine populations, be spaced such that both adult and larval movement between protected areas could occur, and that key habitats were represented and spatially replicated regionwide. To be able to count towards ecological connectivity and habitat replication goals, MPAs need to meet a set of criteria based on these principles (Table 3).

Levels of Protection

The SAT developed a Level of Protection (LOP) framework highly tailored to the specific fisheries, gear types, and species-habitat interactions in each planning region.

Each proposed MPA was assigned an LOP based on its allowed uses with the assumption that allowed activities could occur at maximum plausible intensity. When multiple extractive activities were proposed within a single MPA, the overall LOP for that MPA corresponded to the activity with the lowest LOP.



A scuba diver encounters a school of blacksmith. (M. Haggerty)

Table 3. Overview of SAT Science Guidelines for MPA size, habitat representation and replication, and spacing.

Evaluation Area	SAT Criteria
Size	• Size analyses are conducted at three protection levels: **Moderate-High**, **High**, and **Very High**. * • MPAs must be at least **9 square miles,** with at least **18 square miles preferred**. • Combines contiguous MPAs at or above the three highest levels of protection into **MPA clusters**.
Habitat Representation	• To ensure that MPAs encompass a variety of marine habitat types and communities across a range of depths and environmental conditions, **the percentage and distribution of key habitats** protected in MPAs across all six levels of protection is evaluated.
Habitat Replication	• MPAs must include enough habitat to encompass **90% of the biodiversity** associated with that habitat (based on biological surveys). • MPAs must have an LOP of at least **Moderate-High** and meet **minimum size guidance**. • Bioregions should include at least **3 to 5 replicates,** with at least one replicate within each planning region's sub-bioregion.
Spacing	• MPAs include enough habitat to serve as **habitat replicates.** • MPAs or MPA clusters must have an LOP of at least **Moderate-High** and meet **minimum size guidance**. • Replicate MPAs for a given habitat should be placed at most **31 to 62 miles apart but can be closer**.
* Though the BRTF recommended that proposed MPA arrays prioritize MPAs with Very High and High LOPs, the SAT typically performed size, spacing, and habitat replication analyses at each of the three highest LOPs to facilitate comparisons of alternative proposals.	

SIZE

MPAs that meet SAT guidance thresholds for size and protection form the backbone of the MPA Network.

First is size. Except for estuarine MPAs, to count towards Network-wide objectives, an MPA must have a minimum size of nine square miles (sq. mi), with a preferred size of 18 sq. mi. Estuarine MPAs were not required to meet a minimum size guideline, with the SAT instead recommending protection of the entire estuary, if possible. Second is LOP. To count towards Network-wide objectives, an MPA must have one of the three highest LOPs (Very High, High, or Moderate-High)[6]. Regardless of their individual sizes, adjacent MPAs that meet the LOP criteria and have a collective footprint of nine square miles or more are termed MPA clusters and are grouped together to count towards these goals. MPAs that meet these thresholds of size and protection, whether individually or in a cluster, are the backbone of the MPA Network.

[6] During the Central Coast planning region only MPAs with Very High and High LOPs were included within the LOP threshold for backbone MPAs because the Moderate-high LOP was not established until subsequent planning regions.

HABITAT REPRESENTATION AND REPLICATION

The MLPA stipulated that a variety of marine habitat types and communities across a range of depths and environmental conditions should be represented in MPAs in each bioregion, and that similar habitats should be replicated in at least one SMR per bioregion. This guidance was refined in the Master Plan, which recommended that key marine habitats be represented in the MPA Network and replicated in at least three to five MPAs per bioregion. While representation analyses include all MPAs, regardless of size or LOP (see Table C1 for habitat quantities in individual MPAs), only MPAs that meet the size and protection thresholds are included in habitat replication analyses. Because of this, these backbone MPAs are sometimes referred to as 'replicate MPAs'. However, not all replicate MPAs are replicates of each other (i.e., replication is habitat specific). For an MPA to count as a replicate for a given habitat, it must contain enough of the habitat to capture 90% of the associated biodiversity. The minimum coverage needed to encompass this amount of biodiversity varies by habitat type (Table 4). This is intended to ensure meaningful protection rather than minimal coverage.

Table 4. Minimum habitat length, area, or percent of MPA required to count towards habitat replication in MPAs. Values shown are based on regional biological survey and represent the spatial extent necessary to capture 90% of the habitat's biodiversity in each of California's MLPA Initiative planning regions.

		MLPA Initiative Planning Region			
Habitat	Units	North	North Central	Central (% of MPA)	South
Beach	mi[a]	1.1	~1	20%	~1.14
Rocky shores, including offshore rock	mi[a]	0.55	~0.5	20%	0.48
Kelp	mi[b]	1.1	~1	10%	~1.14
Estuaries	sq mi	0.12	~0.12		0.12
Hard Substrate, 0-30 m	mi[b]	1.1	~1	15%	~1.14
Hard Substrate, 30-100 m	sq mi	0.13	~0.1	10%	~0.20
Hard Substrate, >100 m	sq mi	0.13			~0.22
Soft Substrate, depth zones not combined					
0-30 m	mi[b]	1.1		20%	
30-100 m	sq mi	7		15%	
>100 m	sq mi			10%	
Soft Substrate, multiple depth zones combined					
Total	sq mi	~7			~8
Minimum preferred:					
0-30 m	mi[b]	1.1	~1		~1.14
30-100 m	sq mi	5	~10		~2.24
>100 m	sq mi	1			
100-200 m	sq mi				~1.10
>200 m	sq mi				~0.46

[a]indicates metric corresponds to shoreline distance

[b]indicates metric corresponds to alongshore span

SPACING

To support ecological connectivity and facilitate the dispersal of larvae from bottom-dwelling fish and invertebrates, the SAT advised a maximum spacing interval of 31 to 62 miles between replicate MPAs for a given habitat. This guideline was based on the best available science regarding larval dispersal distances. However, the SAT emphasized that this guideline was intended as a practical design tool rather than a strict ecological threshold. Ecological connectivity varies continuously and is influenced by many factors, including coastline shape, ocean currents, habitat distribution, and species-specific dispersal patterns. Although simple spacing thresholds cannot fully capture the complexity of oceanographic and ecological connectivity along California's coast, the spacing guideline was a valuable proxy tool during the MLPA planning process.

SOCIOECONOMIC CONSIDERATIONS

While not part of the formal evaluations conducted by the SAT, fishery impacts were also considered in evaluating alternative MPA proposals. The MLPA's ecological goals were not intended to be at odds with the state's commercial and recreational fisheries. Rather, MPAs were viewed as complementary to other fisheries management measures as part of a comprehensive framework to sustain marine life, habitats, and, by extension, fisheries. The MLPA specifically requires consultation with local communities and interested parties regarding the socioeconomic and environmental impacts of various MPA alternatives (Fish & G. Code § 2855(c)). To that end, socioeconomic analyses in each planning region incorporated local knowledge interviews with fishermen, along with extensive economic data on region-specific fisheries, including mapping, landings, and ex-vessel revenue. The results of these analyses informed both the design of individual MPAs and comparisons of alternative MPA arrays.



Surfer on shore. (K. Gonzales)

DESIGN OUTCOMES OF MLPA PLANNING PROCESS SCIENCE GUIDANCE

The following analyses were conducted on the existing MPA Network at a statewide or bioregion scale using best currently available statewide data.

WHAT PORTION OF MPAS CURRENTLY MEET SAT SCIENCE GUIDELINES TO SUPPORT NETWORK-WIDE ECOLOGICAL GOALS?

LOP AND MPA SIZE: Most (89 of 124, or 72%) MPAs within the MPA Network have one of the three highest LOPs (Very High, High, or Moderate-high; Figure 4). This percentage is similar across the three bioregions (Figure 5).

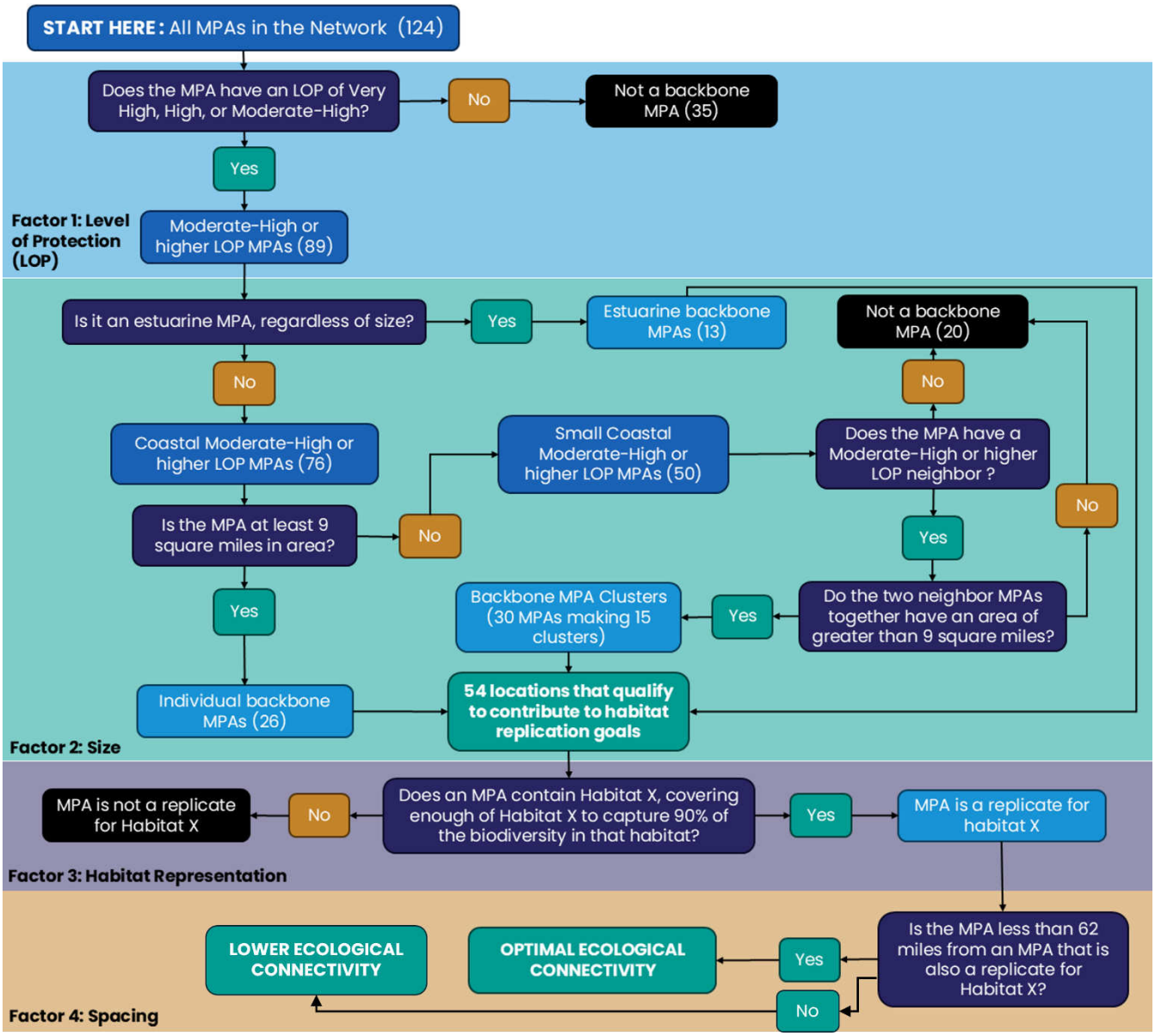


Figure 4. Conceptual diagram illustrating the number of MPAs that currently meet design criteria established by the Science Advisory Team during the MLPA Initiative planning process (e.g., Level of Protection, size, habitat representation and replication, and spacing).

Of the 89 MPAs that meet the LOP requirement as determined by the SAT during the MLPA Initiative planning process (Very High, High, or Moderate-high), 13 are estuarine MPAs (Figure 6). Estuarine MPAs that meet the LOP criteria are considered in replication analyses regardless of their size. This is because applying the minimum size requirement or requiring co-location with another contiguous MPA to create a cluster would have greatly limited siting possibilities.

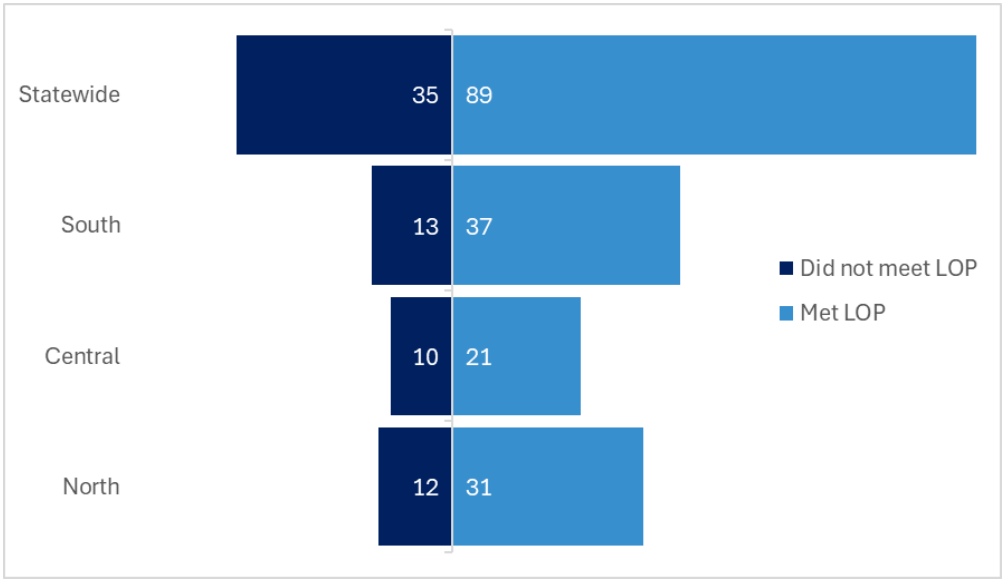


Figure 5. Number of California MPAs statewide and by bioregion that meet the Level of Protection (LOP) categories of Very High, High, or Moderate-High. Most (72%) were designed with at least a Moderate-high LOP.

When contiguous MPAs each had an LOP greater than Moderate-high, the SAT grouped them into an MPA cluster. Regardless of each MPA's individual area, if the cluster has a total area greater than 9 sq. mi., it functions as a backbone MPA and is counted in replication analyses (Figure 4). Apart from the 13 estuarine MPAs, of the remaining 76 MPAs that meet the LOP requirement, 26 have an area greater than 9 sq. mi. and do not have a neighboring MPA (i.e., not a cluster MPA). Thirty MPAs comprise 15 clusters of contiguous MPAs, and each individual cluster has a total area greater than 9 sq. mi. (Figure 6).

The remaining 20 of the 89 MPAs that meet one of the three highest LOPs are either smaller than the 9-sq. mi. minimum size guideline or are not clustered with an adjacent MPA to collectively meet that guideline. While these MPAs may not serve as

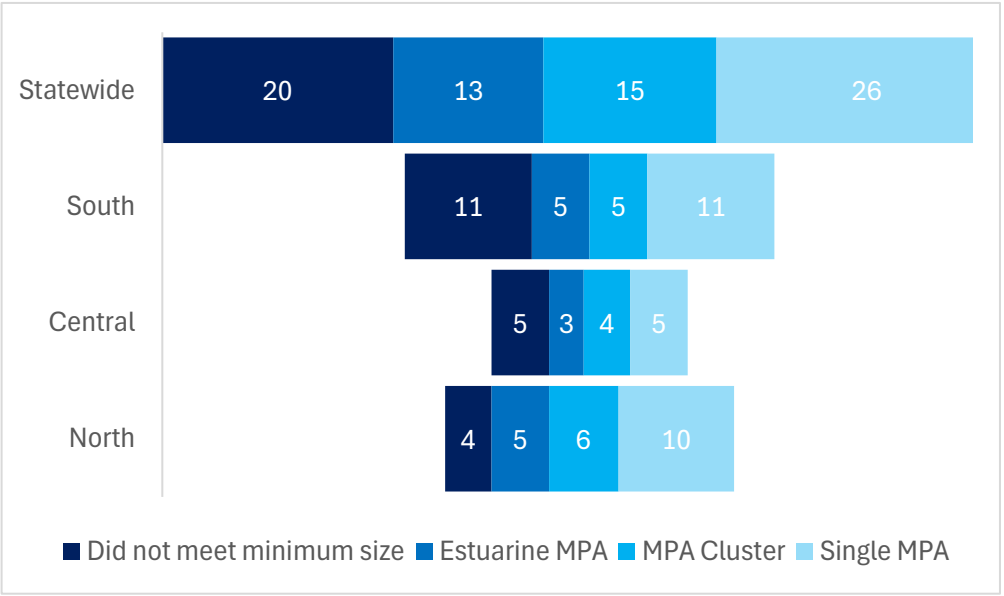


Figure 6. Number of California MPAs statewide and by bioregion that meet the LOP and size criteria to serve as backbone MPAs (e.g., at least Moderate-high LOP and 9 sq. mi.). Most (78%) MPAs meeting the LOP criteria also meet the size guideline or are estuarine MPAs.

backbone components of the MPA Network, they were often designed to achieve local conservation objectives. For example, some smaller MPAs were specifically designed to protect nearshore habitats such as rocky intertidal areas and shallow reef systems. In these cases, maximizing the size of the MPA by increasing the offshore extent would not necessarily have improved achievement of the individual MPA's intended objectives and may have introduced additional undesirable tradeoffs.

In combination, these 13 estuarine MPAs, 26 individual MPAs, and 30 MPA clusters make up the ecological backbone of the MPA Network and strengthen the likelihood that the MPA Network will achieve the MLPA's ecological objectives (Table 5).

Table 5. California MPAs that meet the Level of Protection and size criteria to qualify as backbone MPAs (e.g., at least Moderate-high LOP and 9 sq. mi.).

Individual MPAs	MPA Clusters	Estuary MPAs
• Pyramid Point SMCA • Point St. George Reef SMCA • Samoa SMCA • South Cape Mendocino SMR • Mattole Canyon SMR • Sea Lion Gulch SMR • Big Flat SMCA • Double Cone Rock SMCA • Stewarts Point SMR • North Farallon Islands SMR • Año Nuevo SMR • Soquel Canyon SMCA • Portuguese Ledge SMCA • Big Creek SMR • Vandenberg SMR • Point Conception SMR • Campus Point No-Take SMCA • Richardson Rock SMR • Harris Point SMR • Carrington Point SMR • South Point SMR • Gull Island SMR • Scorpion SMR • Anacapa Island SMR • Begg Rock SMR • Santa Barbara Island SMR	• Reading Rock SMR/SMCA • Ten Mile Beach SMCA/Ten Mile SMR • Point Arena SMR/SMCA • Bodega Head SMR/SMCA • Point Reyes SMR/SMCA • Southeast Farallon Islands SMR/SMCA • Montara SMR/Pillar Point SMCA • Point Sur SMR/SMCA • Piedras Blancas SMR/SMCA • Point Buchon SMR/SMCA • Point Dume SMR/SMCA • Point Vicente No-Take SMCA/Abalone Cove SMCA • Blue Cavern Onshore No-Take SMCA/Blue Cavern Offshore SMCA • Farnsworth Onshore/Offshore SMCA • Laguna Beach SMR/No-Take SMCA	• Ten Mile Estuary SMCA • Russian River SMRMA • Estero Americano SMRMA • Estero de San Antonio SMRMA • Estero de Limantour SMR • Elkhorn Slough SMR • Moro Cojo Slough SMR • Morro Bay SMR • Goleta Slough No-Take SMCA • Bolsa Chica Basin No-Take SMCA • Batiquitos Lagoon No-Take SMCA • San Elijo Lagoon No-Take SMCA • Famosa Slough No-Take SMCA

MPA SPACING: Backbone MPAs (those individual MPAs and MPA clusters that meet the size and LOP criteria) were strategically placed within a maximum spacing interval of 31 to 62 miles to facilitate larval dispersal (Figure 7). This maximum range was intended as a guideline to support ecological connectivity, not a strict cutoff beyond which larvae are unable to disperse. Because MPA spacing methodologies (i.e., between edges or midpoints) were inconsistently applied across regions during the initial planning phases, we used the nearest edge-to-edge over-water distance between adjacent backbone MPAs. Adopting this metric establishes a uniform baseline that reflects the absolute minimum dispersal gap between protected habitats.[7] Over-water distances between backbone MPAs ranged from 1.5 to 60.3 miles, with an average (± SD) distance of 16.45 ± 10.6 miles between nearest MPA backbone neighbors. Distances between Channel Islands backbone MPAs were included in this calculation, though the SAT advised during the South Coast regional planning



Figure 7. Linear over-water distance (miles) between California backbone MPAs in the (a) North, (b) Central, and (c) South bioregions. All backbone MPAs are within 62 miles of at least two neighboring backbone MPAs. The northernmost and southernmost lines extend to the borders with Oregon and Mexico, respectively, to indicate the nearest potential replicate outside of the state.

[7] Evaluating MPA spacing via nearest edge-to-edge distance provides the minimum geographic gap between habitats. While this method reflects the shortest potential dispersal path for marine organisms, it is less conservative when testing network compliance against maximum spacing thresholds than a midpoint-to-midpoint calculation.

process that, due to the complex geography and ocean currents around the Channel Islands, guidelines other than spacing may be more relevant to their design.

HABITAT REPRESENTATION AND REPLICATION: Key habitats that should be represented in the MPA Network were outlined in the MLPA and refined in the Master Plan for MPAs. The Master Plan recommended at least three to five replicate MPAs be designed for each habitat type within a biogeographical region. The SAT further advised that key marine habitats be replicated in at least one MPA within each planning region's sub-bioregions. California's marine habitats are diverse and not evenly distributed throughout state waters. Some habitat types may only be available (i.e., present) in certain areas and/or depths. Therefore, the capacity to meet habitat representation and replication guidelines during the planning process was sometimes constrained by habitat availability, habitat spatial heterogeneity, and bathymetry. For example, the SAT explicitly stated in their methodology for the North Central Coast Study Region that habitats deeper than 100 m did not need to be represented or replicated in that region because they are generally less available.

The key habitats analyzed in this document include rocky shore, sandy beach, estuarine, and kelp forest, as well as hard and soft substrate in four depth zones (0-30 m, 30-100 m, 100-200 m, and >200 m). Each of these habitats is represented in each bioregion in the MPA Network, and the replication guideline was met within each bioregion for all habitats analyzed here (Table 6).



Fishing at Pigeon Point. (S. Worden)

Table 6. Number of replicates of each key habitat statewide and within each bioregion per SAT Science Guidelines developed during the MLPA Initiative planning process. Shaded boxes indicate habitats within bioregions that met the recommendation of at least 3-5 replicates of a given habitat per bioregion. For each habitat, areas of coastline (and corresponding bioregion) representing a distance >62 miles between habitat replicates are listed.*

Habitat	Statewide	North	Central[1]	South	Distance >62 miles between habitat replicates (Bioregion)
Beach	31	13	7	11	• Ten Mile Cluster to Stewarts Point SMR (North) • South of Orange County/Catalina Island MPAs (South)
Rocky shore, inc. offshore rocks	36	15	7	14	• South of Orange County/Catalina Island MPAs (South)
Kelp	22	3	6	13	• North of Ten Mile Cluster (North) • Stewarts Point SMR to Año Nuevo SMR (North/Central) • South of Orange County/Catalina Island MPAs (South)
Estuary	11	4	3	4	• Ten Mile Estuary SMCA to Russian River SMRMA (North) • Estero de Limantour SMR to Elkhorn Slough SMR (North/Central) • Moro Cojo Slough SMR to Morro Bay SMR (Central) • Morro Bay SMR to Goleta Slough (No-Take) SMCA (Central/South) • Goleta Slough (No-Take) SMCA to Bolsa Chica Basin (No-Take) SMCA (South)
Hard substrate, 0-30 m	25	9	7	9	• Pyramid Point SMCA to Double Cone Rock SMCA (North) • Point Vicente/Abalone Cove Cluster to Campus Point (No-Take) SMCA and to Gull Island SMR (South)
Hard substrate, 30-100 m	27	11	7	9	• South of Catalina Island (South) • East of the Northern Channel Islands (South)
Hard substrate, >100 m [2]	5	1	1	3	• North of Mattole Canyon SMR (North) • Mattole Canyon SMR to Soquel Canyon SMCA (North/Central) • Soquel Canyon SMCA to Harris Point SMR (Central/South) • South and east of Begg Rock SMR (South)
Soft substrate, all depths [3]	33	12	8	13	• Ten Mile Cluster to Stewarts Point SMR (North)

* Potential discrepancies with historical planning data are attributed to refinements in data accuracy and resolution.

[1] In this analysis, the habitat minimums established for the North Central Coast Study Region were used to determine habitat replication for MPAs in the Central Coast Study Region.

[2] The SAT explicitly stated that habitats deeper than 100 m did not need to be represented or replicated in the North Central Coast Study Region because they are generally less available (California Marine Life Protection Act Initiative. 2008. Methods Used to Evaluate MPA Proposals in the North Central Coast Study Region. California Natural Resources Agency, Sacramento, CA)



California spiny lobsters find refuge between rocks amongst sea urchins. (D. Stein, CDFW)

[3] To ease comparison among regions, the total area of soft substrate across a range of depths was assessed, without prioritizing preferred depth-specific minimums.

HABITAT SPACING: The SAT advised a maximum spacing interval of 31 to 62 miles between replicate MPAs of a given habitat (i.e., MPAs that meet the size, LOP, and minimum habitat criteria).

Overall, most key habitats in California's MPA Network meet this spacing guidance (Table 6). Replicates for beach (Figure C1), rocky shore (Figure C2), and soft substrate (Figure C3) habitats are generally well distributed along the coast statewide.

In some cases, apparent spacing gaps between habitat replicates (Figures C4-6) reflect the distribution of the habitat itself, rather than limitations of the MPA Network design. For example, hard substrate habitat is relatively limited compared to soft substrate habitat, and deeper habitats (>100 m) often occur beyond the limit of state waters, where state MPAs cannot be designated. Bull kelp (*Nereocystis luetkeana*) canopy is also naturally patchy along the northern California coast, sometimes resulting in relatively large gaps between canopy areas (Figure C7).

Unlike open coastal habitats, estuaries may be more influenced by upstream dynamics and human activities than by ocean currents. As a result, estuaries are not expected to be connected to each other in the same way as other habitats. For estuarine MPAs, connections to surrounding marine habitats, which support species that move between these habitats over their lifetimes, may be more important than spacing between estuarine replicates (Figure C8).

In southern California, particularly in San Diego County, spacing between habitat replicates was not met for all key habitats (excluding estuaries, Table 6). This reflects intentional design decisions made during the planning process to balance MPA Network ecological goals with continued human uses. For instance, some No-take MPAs were designed to be smaller than the recommended size threshold, and in one case, an MPA lost its backbone status when a Moderate-low take allowance was later adopted to avoid conflicts with existing California State Parks uses.

Overall, habitat spacing across the MPA Network is generally consistent with SAT Science Guidelines. Where gaps occur, they often reflect heterogeneity in habitat distributions or represent intentional design tradeoffs made during the planning process. These patterns provide important context for evaluation and management of the MPA Network today.

WHAT PERCENTAGES OF KEY HABITATS ARE PROTECTED WITHIN THE CURRENT MPA NETWORK?



Estuary at the Santa Ynez River mouth. (K. Gonzales, CDFW)

CDFW conducted an analysis in 2026 using the best available comprehensive statewide data for 12 of the key habitats considered during the MLPA Planning process and found that, on average, approximately one-quarter of the total mapped extent of those habitats is contained within MPAs statewide (proportion: 0.24 ± 0.11 SD). The two habitats with the highest percentages represented within MPAs statewide are hard substrate from depths of 100-200 m (58%) and 30-100 m (29%; Table 6). The two habitats with the lowest percentages contained within MPAs statewide are estuaries (12%) and soft substrate from depths of 0-30 m (15%; Table 7).

Across bioregions, the percentages of kelp, beach, rocky intertidal, estuarine, and soft substrate habitats within MPAs are generally similar, despite regional differences in availability of habitat (Figures 8-9; Table 7). The same pattern is true for shallower hard substrate (Figure 8). However, in deeper waters, the percentage of hard substrate within MPAs varies widely across bioregions (Figure 9; Table 7).



Rockfish swimming near the ocean floor. (CDFW/MARE)

Table 7. Percent and total amount of key habitats contained in MPAs by bioregion and statewide. Values include all MPAs, regardless of LOP, size, or classification. Potential discrepancies with historical data are attributed to ongoing updates in data availability.

Habitat	Metric	Statewide	North	Central	South
Beach (mi[a])	%	17	15	24	14
	Total	185.3	59.2	64.9	61.1
Rocky shore, excluding offshore rocks (mi[a])	%	27	26	33	24
	Total	223.2	77.7	77.3	68.2
Maximum kelp canopy, 1984-2023 (mi[b])	%	22	21	30	18
	Total	121.4	18.9	46.5	55.9
Estuaries (sq mi)	%	12	9	56	6
	Total	16.0	5.7	7.0	3.3
Hard substrate					
0-30 m (mi[b])	%	23	25	31	17
	Total	111.8	33.4	43.6	34.8
30-100 m (sq mi)	%	29	28	22	35
	Total	43.4	18.8	9.1	15.6
100-200 m (sq mi)	%	58	37	45	66
	Total	6.5	0.29	1.5	4.8
>200 m (sq mi)	%	22	44	15	29
	Total	3.6	0.03	1.3	2.3
Soft substrate					
0-30 m (mi[b])	%	15	13	16	16
	Total	120.0	31.8	29.1	59.1
30-100 m (sq mi)	%	17	19	15	16
	Total	363.3	157.8	86.6	119.0
100-200 m (sq mi)	%	22	20	24	23
	Total	76.1	12.7	19.0	44.4
>200 m (sq mi)	%	18	28	21	16
	Total	79.3	2.2	25.3	51.8

[a]indicates metric corresponds to shoreline distance
[b]indicates metric corresponds to alongshore span



Fishing boat offshore of Point Pinos. (S. Worden)

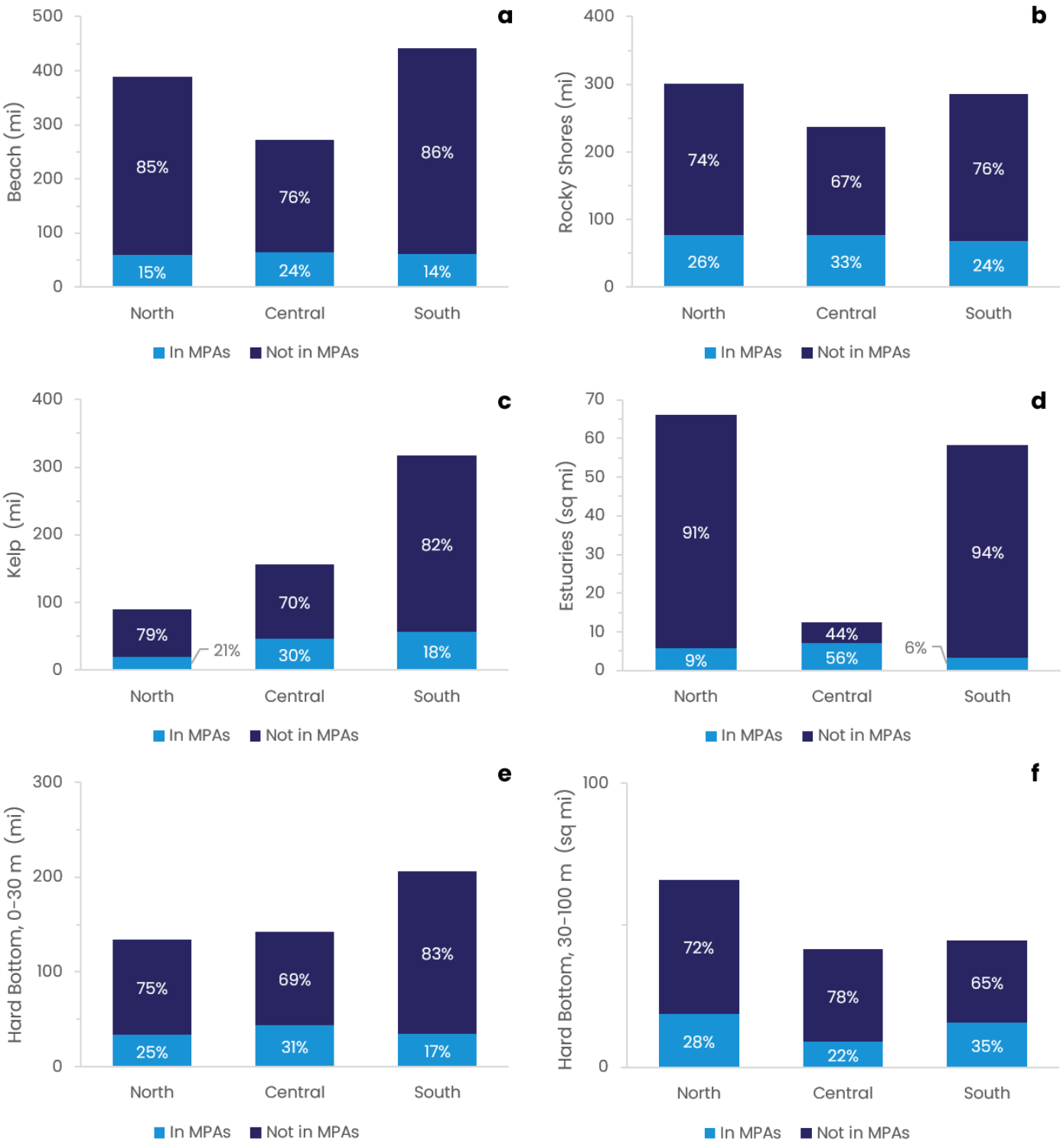


Figure 8. Absolute and relative (%) amounts of (a) beach, (b) rocky shores (not including offshore rock), (c) maximum kelp canopy (1984-2023), (d) estuarine habitat, and hard substrate at depths of (e) 0-30 m and (f) 30-100 m in MPAs (light blue) and not in MPAs (dark blue) by California bioregion.

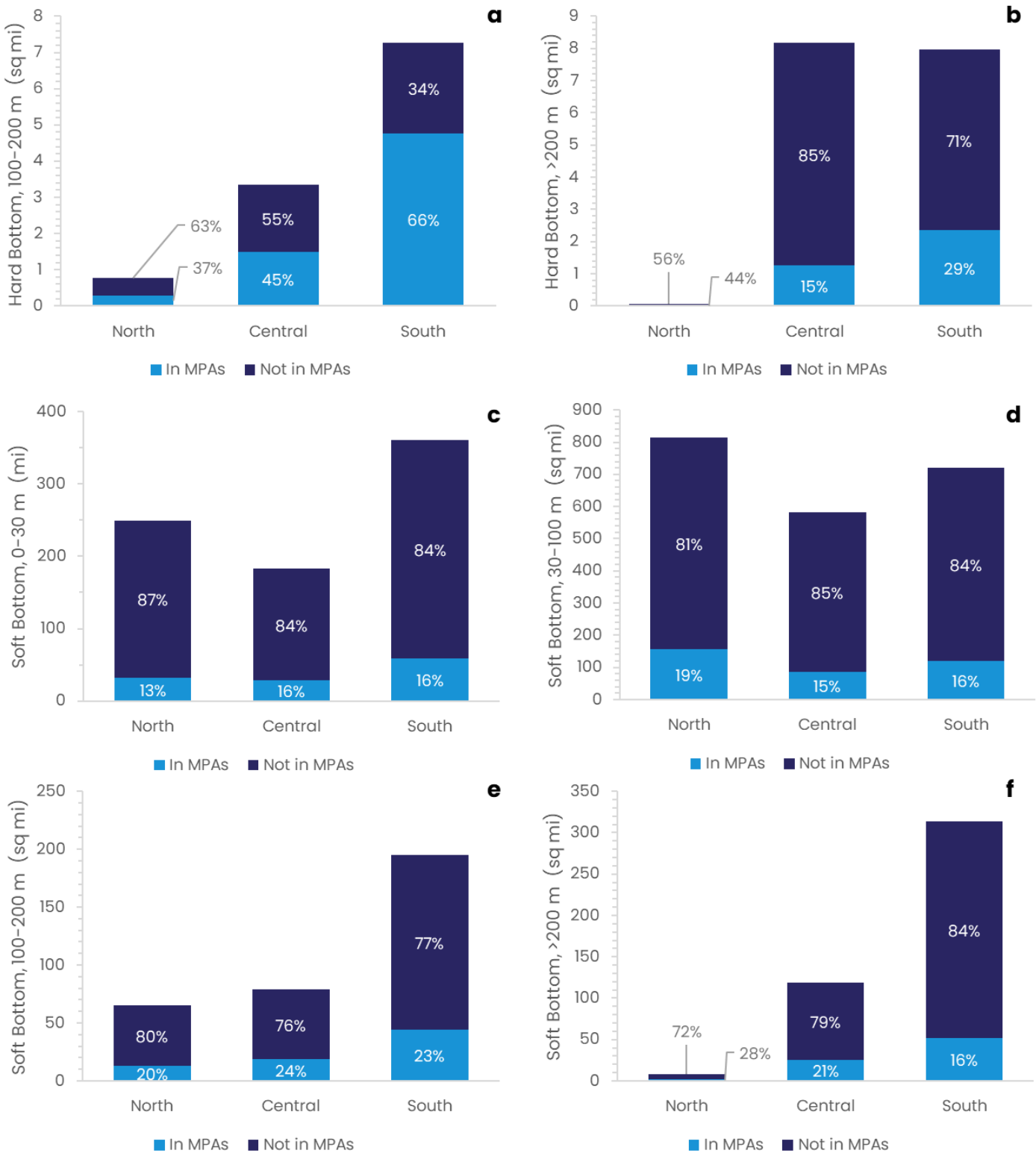
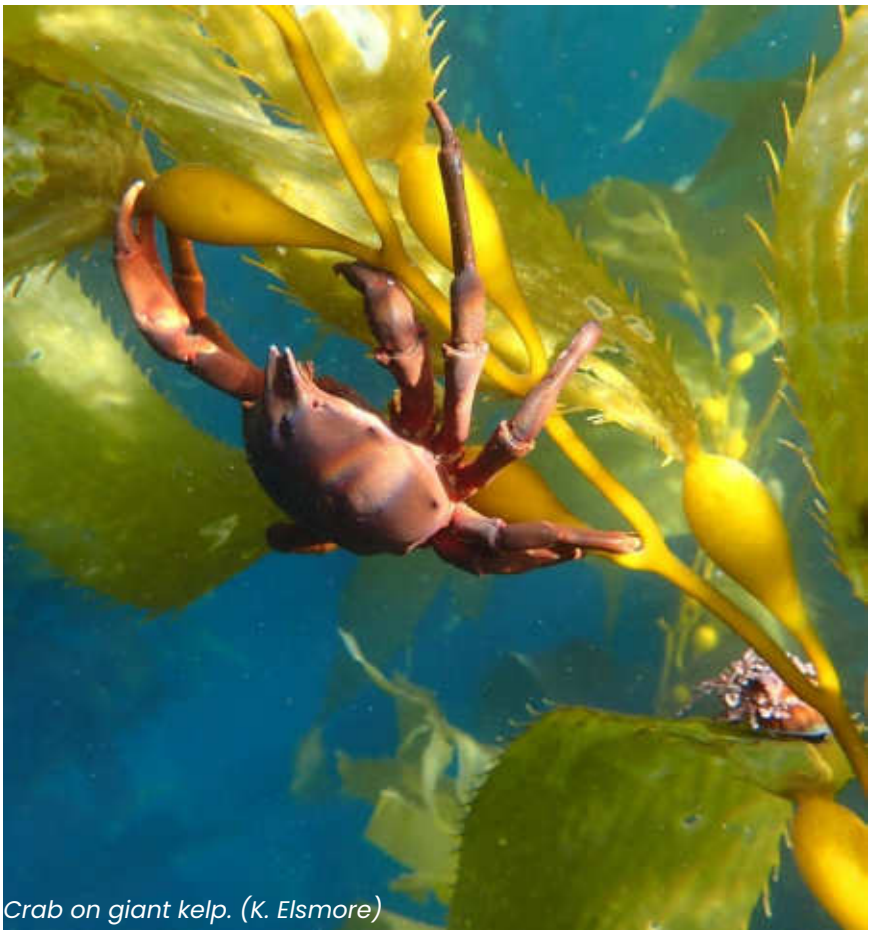


Figure 9. Absolute and relative (%) amounts of hard substrate at depths of (a) 100-200 m and (b) greater than 200 m, and soft substrate at depths of (c) 0-30 m, (d) 30-100 m, (e) 100-200 m, and (f) greater than 200 m that is contained in MPAs (light blue) and not in MPAs (dark blue) by California bioregion.



Crab on giant kelp. (K. Elsmore)

WHAT PERCENTAGE OF THE CURRENT EXTENT OF KELP CANOPY IS INCLUDED WITHIN THE MPA NETWORK?

Kelp forests are one of California's most productive and biodiverse marine ecosystems, dominated by giant kelp (*Macrocystis pyrifera*) in southern California and bull kelp (*Nereocystis luetkeana*) in northern California, with a mix of both species in central California. Accordingly, kelp forests were among the key habitats explicitly identified for protection during the MLPA Initiative planning process. The statewide MPA Network was fully implemented in 2012, shortly before an unprecedented marine heatwave (MHW) and associated ecological stressors resulted in widespread, but regionally variable, declines in kelp cover[8]. Because kelp abundance and distribution naturally fluctuate across a range of spatial and temporal scales, distinguishing the influence of MPAs from broader environmental drivers remains an active area of research. Nevertheless, long-term datasets provide an opportunity to quantify changes in the proportion of kelp canopy occurring within the MPA Network over time.

During the MLPA Initiative planning process, the kelp canopy data used to inform MPA design were derived from 2-meter spatial resolution CDFW aerial surveys conducted in multiple years between 1989 and 2008 (the specific survey years used varied among regional planning processes). These surveys continued after MPA Network implementation but have not occurred since 2016, limiting their ability to characterize more recent changes in kelp canopy extent. Landsat imagery[9] was thus selected for this analysis because it offers a consistent long-term statewide time series of kelp canopy observations extending from before MPA Network implementation through recent years, including the period following the 2014-2016 MHW.

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[8] CDFW. 2021. Giant Kelp and Bull Kelp Enhanced Status Report. CDFW, Marine Region.

[9] Note that Landsat's spatial resolution (30 m) is coarser than that of CDFW's aerial imagery (~2 m), which may increase the likelihood that small or sparse patches of kelp canopy are not detected. This limitation is particularly relevant in northern California, where bull kelp, the dominant canopy-forming species, exhibits lower surface biomass than giant kelp, which is dominant in southern California. As a result, fragmented or low-density patches of bull kelp are more likely to be missed, and overall extent of bull kelp canopy may be underestimated. This may occur in both datasets, though the effect is likely more pronounced in the coarser-resolution Landsat imagery.

Annual third-quarter Landsat-derived kelp canopy observations[10] were compiled for 1984-2023 and converted into annual presence-absence spatial datasets. For selected time periods, annual observations were combined to identify the maximum observed extent of kelp canopy across all selected years (i.e., maximum extent of all areas where kelp was detected during at least one year of the selected timeframe). To align with the methodology used during the MLPA Initiative planning process, kelp extent was evaluated as an alongshore linear, rather than areal, measure spanning the alongshore length of kelp canopy from a composite of all relevant years of data. This was done to ensure that both steep and gently sloping kelp beds are considered equally in analyses, since a narrow band of kelp along a steep shore and a broader bed along a gently sloping shore are likely to encompass similar biological richness so long as they extend along a similar length of shoreline. The linear distance was drawn to encompass the full kelp extent following the shape of the shoreline, bathymetric contours, and the canopy itself. Therefore, the cumulative length of kelp canopy is not directly comparable to the length of the state's coastline.


Bull kelp under water. (CDFW)

This linear maximum extent metric was then used to quantify the proportion of statewide kelp canopy extent occurring within MPAs during four time periods selected to capture different ecological and management contexts. The 2007-2013 timeframe provides a reference period encompassing conditions spanning regional implementation of the MPA Network, which occurred between September 2007 and December 2012. The 2014-2016 period captures the major MHW and its immediate effects on kelp extent. Although elevated ocean temperatures and additional heatwaves occurred beyond 2016 and ecological responses may continue to emerge in subsequent years, these years were analyzed separately to isolate the initial disturbance. The 2017-2023 period represents post-MPA implementation conditions following the MHW through the release of the DMR and the start of the MPA petition process. Finally, 1984-2023 provides a long-term baseline for comparison.

To evaluate areas of recurring kelp presence using similar timeframes, 7-year kelp persistence was also assessed for the time periods 2007-2013 and 2017-2023. Consistent with the methodology used during the MLPA Initiative planning process, persistent kelp was defined as areas where kelp was detected in at least three of the seven years in the selected time frame.

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[10] Santa Barbara Coastal LTER; Bell, T.; Cavanaugh, K., and Siegel, D. (2023) *SBC LTER: Time series of quarterly NetCDF files of kelp biomass in the canopy from Landsat 5, 7 and 8, since 1984 (ongoing)* ver 13. Environmental Data Initiative. In: Environ. Data Initiat. https://doi.org/10.6073/pasta/93b47266b20bc1782c8df9c36169e372.

Persistence was not determined for the 2014-2016 or 1984-2023 periods because they encompassed different numbers of years and would not be comparable to the two seven-year periods.

These analyses are descriptive and intended to characterize broad patterns in kelp canopy extent and representation within the MPA Network. No formal analyses were conducted to evaluate the statistical significance of observed differences. Likewise, these analyses do not evaluate the ecological importance of observed differences or identify the processes driving them. Additional exploration into the influences of environmental variability, species interactions, management, and other factors would be required to evaluate the ecological significance of observed trends.

The maximum alongshore linear extent of kelp canopy observed between 1984 and 2023 spanned 563 miles statewide, with 122 miles occurring within MPAs (21.6%; Figure 10). Maximum kelp canopy observed pre-MPA implementation (2007-2013) totaled 537 miles statewide, representing 95% of the full 1984-2023 maximum extent. During the 2014-2016 MHW, maximum kelp extent declined to 430 miles before increasing modestly to 454 miles in more recent years (2017-2023). Despite these substantial changes in total observed kelp extent, the proportion of kelp extent occurring within MPAs remained consistent across all time periods analyzed, ranging from 21.4-21.6%.

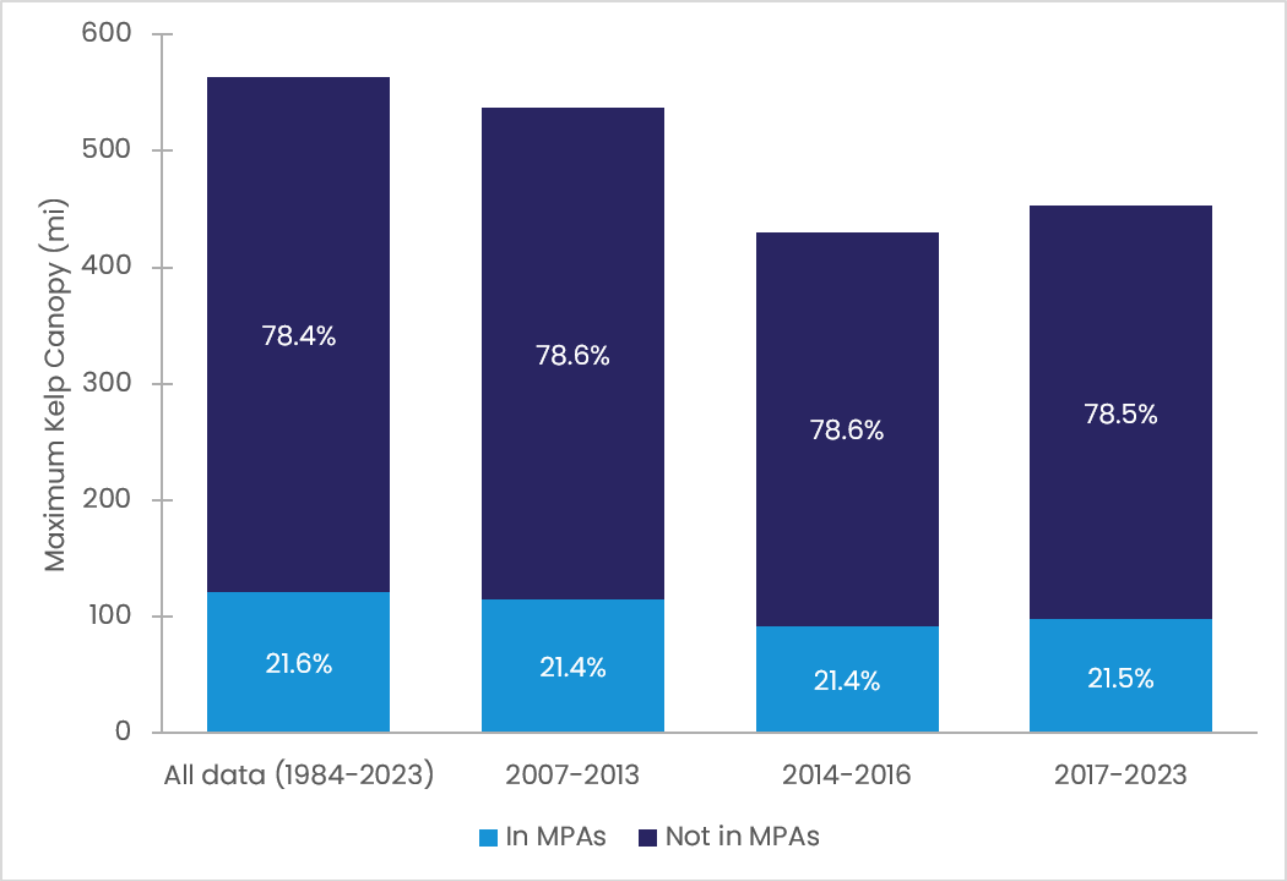


Figure 10. Total and relative (%) extent of maximum kelp canopy within MPAs (light blue) and outside of MPAs (dark blue) statewide for the time periods 1984-2023, 2007-2013, the 2014-2016 marine heat wave, and 2017-2023.



Spanish shawl nudibranch in Scorpion SMR. (A. Van Diggelen)

Persistent kelp canopy decreased from 462 miles during 2007-2013 to 302 miles during 2017-2023 (Figure 11). Despite the 34.7% decline of persistent kelp statewide following the MHW, the proportion of persistent kelp occurring within MPAs remained fairly stable, with a 0.9% increase in the 2017-2023 period, indicating the MPA Network may have afforded limited benefits to persistent kelp. In contrast, during this same period, persistent kelp represented a substantially smaller proportion of total maximum kelp extent. For example, during 2007-2013, approximately 86% of the maximum observed kelp extent was persistent (i.e., detected in at least three of seven years), compared to 66% during 2017-2023. This indicates that while kelp continued to occur across much of its historical range, it was present less consistently across years following the 2014-2016 MHW.

Overall, the proportion of the state's maximum and persistent kelp captured within the MPA Network did not appreciably change following implementation and large-scale disturbance, though the slight increase in persistent kelp warrants further study.

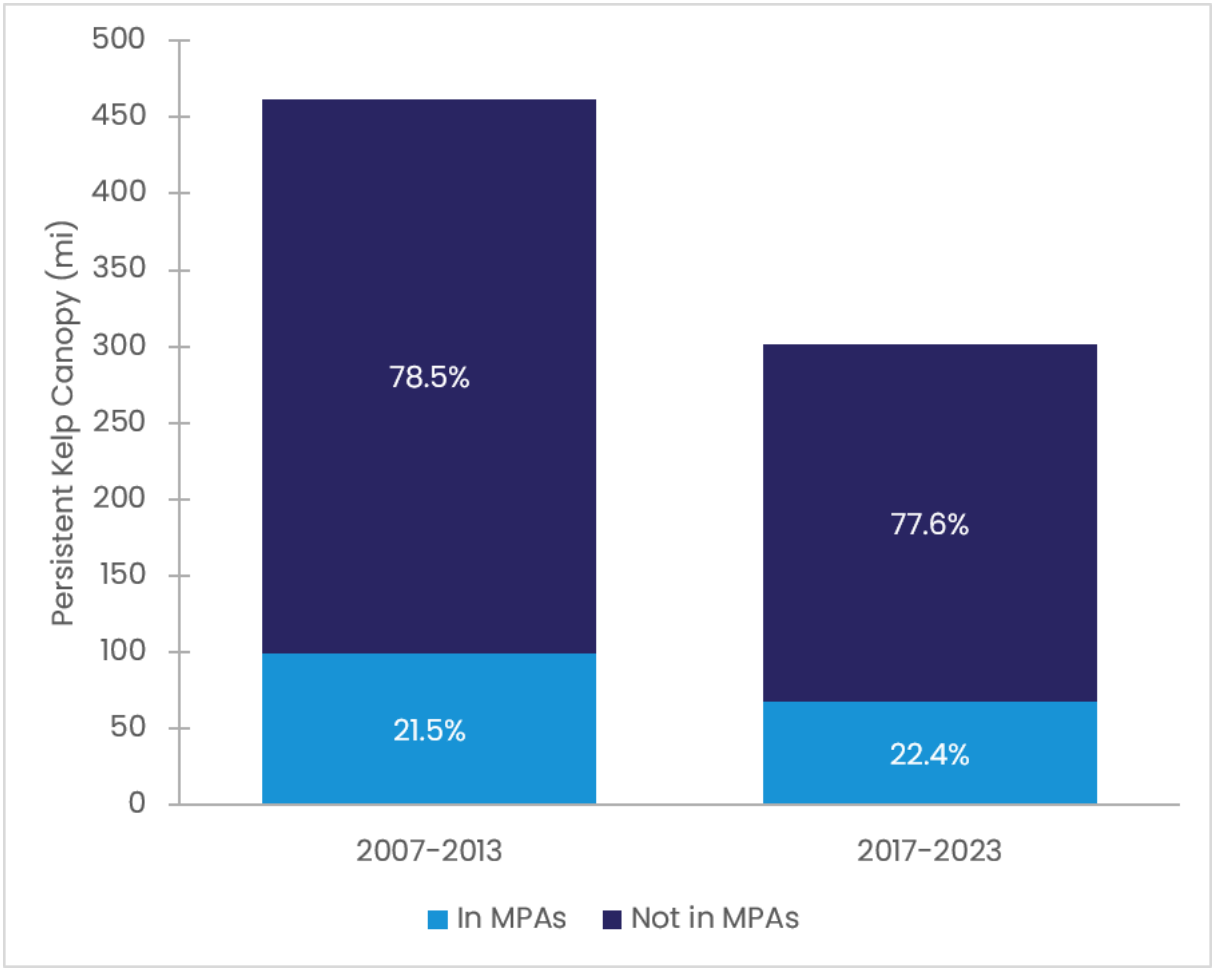


Figure 11. Total and relative (%) extent of persistent kelp canopy within MPAs (light blue) and outside of MPAs (dark blue) statewide for the two 7-yr time periods before (2007-2013) and after (2017-2023) the 2014-2016 marine heat wave.

Within the three bioregions, the maximum extent of kelp canopy varied considerably across all time periods, with the South bioregion containing the greatest extent of both maximum and persistent kelp canopy and the North bioregion the least (Figures 12-13). This is consistent with observations of patchy declines in southern California, localized declines in central California, and extreme and persistent declines in northern California (CDFW 2021). Maximum kelp extent declined during the 2014-2016 MHW in all three bioregions and increased somewhat during 2017-2023, but the magnitude of recovery differed substantially. By 2017-2023, maximum kelp extent in the Central bioregion had returned to 99% of its 2007-2013 extent, whereas the North bioregion recovered to only 51%. Persistent kelp exhibited an even stronger regional contrast, declining by 10% in the Central bioregion compared to 87% in the North bioregion.

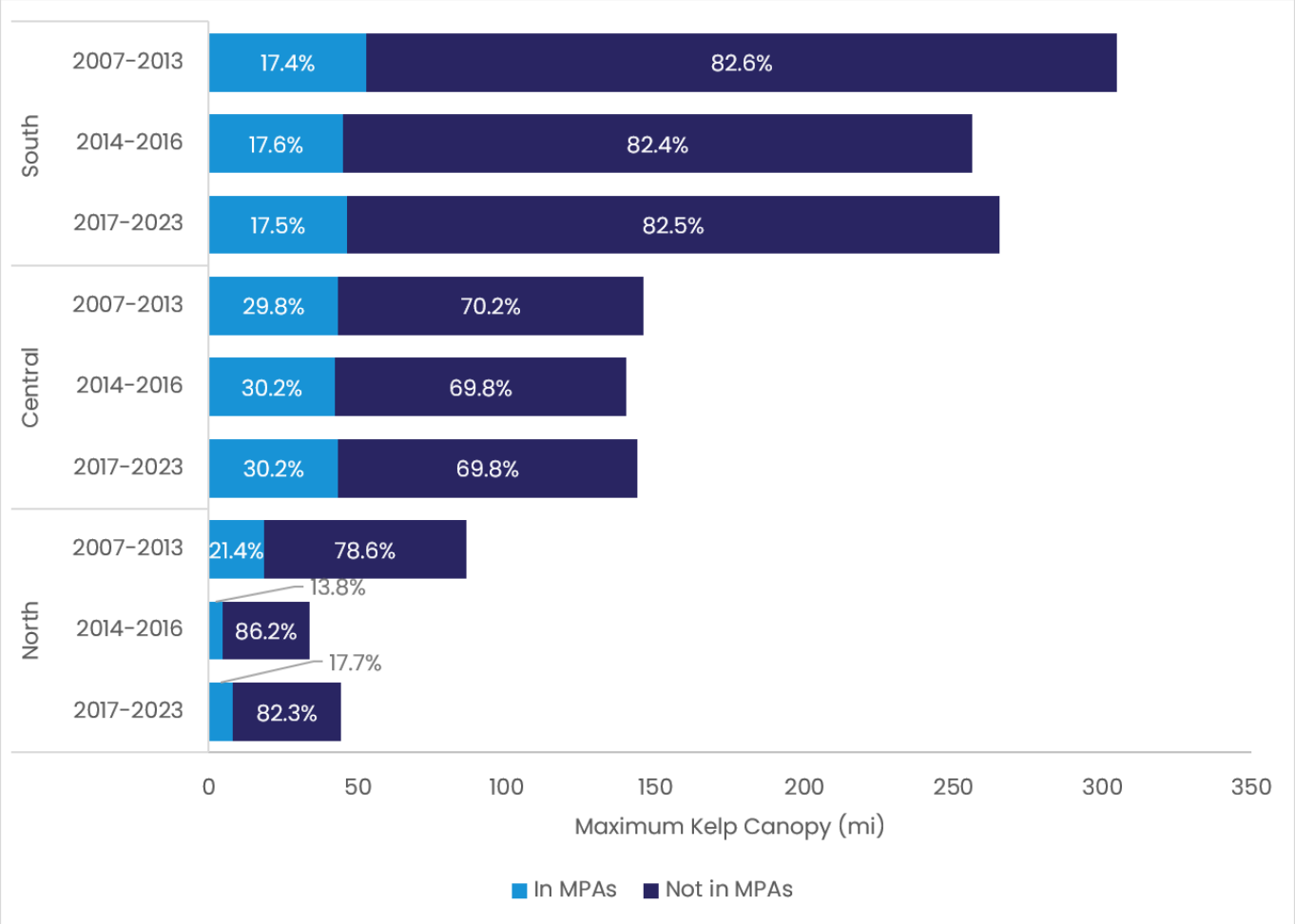


Figure 12. Absolute and relative (%) extent of maximum kelp canopy within MPAs (light blue) and outside of MPAs (dark blue) in California's three bioregions during three timeframes, 2007-2013, the 2014-2016 marine heat wave, and 2017-2023.



Sea lions gather on a sandy beach. (K. Gonzales)

Regional differences were also evident in the relative proportion of kelp within MPAs versus outside of MPAs. Across time periods, MPAs consistently represented approximately 17-18% of maximum kelp in the South bioregion and approximately 30% in the Central bioregion, indicating that regional representation remained stable despite substantial fluctuations in total kelp extent (Figure 12). A similar pattern was observed for persistent kelp (Figure 13). Notably, the Central bioregion consistently contained the highest proportion of kelp within MPAs, with approximately 30% of both maximum and persistent kelp occurring within MPAs.

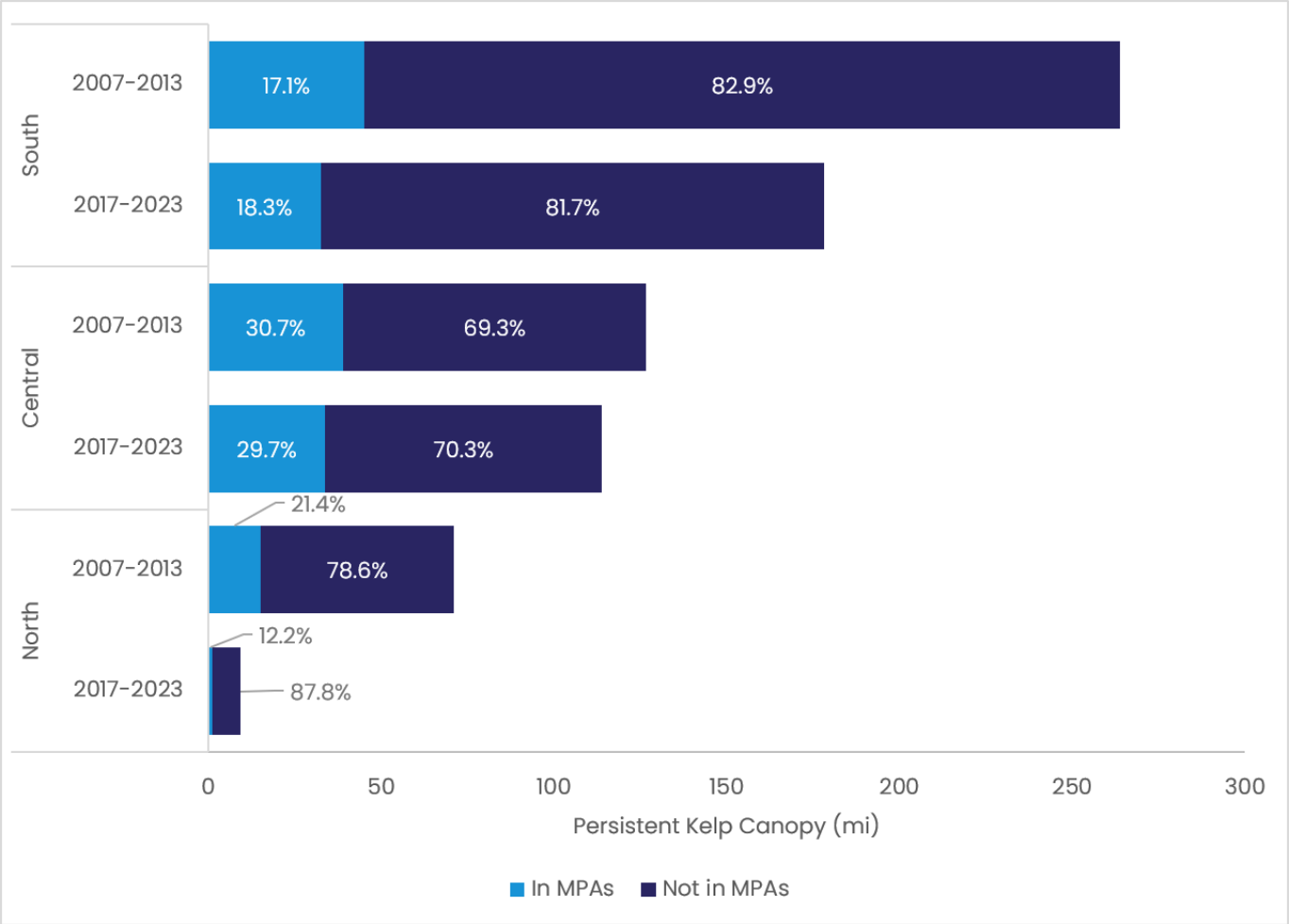


Figure 13. Absolute and relative (%) extent of persistent kelp canopy contained within MPAs (light blue) and outside of MPAs (dark blue) in California's three bioregions for the two 7-yr time periods before (2007-2013) and after (2017-2023) the 2014-2016 marine heat wave.

In contrast, the North bioregion exhibited substantial changes in both the extent of kelp and its representation within MPAs. Maximum kelp within MPAs declined from 18.4 miles during 2007-2013 to 7.8 miles during 2017-2023 (57% decline), and the proportion of maximum kelp within MPAs decreased from 21.4% to 17.7% (Figure 12). Declines were even greater for persistent kelp. Total persistent kelp within the North bioregion's MPAs decreased from 15.2 miles to 1.1 miles (92% decline), while the relative proportion within the region's MPAs declined from 21.4% to 12.2% (Figure 13).

During 2007-2013, approximately 83% of the maximum kelp extent detected in the North bioregion was persistent, compared to only 15% during 2017-2023, indicating that many locations that historically supported persistent kelp were greatly impacted following the 2014-2016 MHW. Prior to the disturbance, the MPA Network within the North bioregion contained an equal proportion (21.4%) of both maximum and persistent kelp, suggesting that persistent kelp was not disproportionately concentrated within MPAs relative to overall kelp presence. However, examination of the data within individual MPAs indicates that persistent kelp was not distributed evenly among MPAs in the North bioregion. More than 85% of the persistent kelp occurring within MPAs in the North bioregion during 2007-2013 was contained in just five MPAs (Point Arena SMR, Saunders Reef SMCA, Stewarts Point SMCA, Stewarts Point SMR, and Salt Point SMCA), all of which are located along the Sonoma-Mendocino coast. This region experienced some of the most severe and persistent kelp declines following the 2014-2016 MHW, suggesting that the observed disproportionate decrease in persistent kelp within MPAs was strongly influenced by the geographic distribution of historically persistent kelp and regional ecological conditions rather than MPA status itself.

Ultimately, impacts to kelp following major environmental disturbance were not distributed equally statewide. The proportion of kelp within MPAs remained largely stable in the Central and South Coast regions, but was severely impacted in the North Coast region. Research is ongoing to better understand the relative influence of environmental and ecological drivers on patterns of kelp persistence and recovery.



Scuba diver in a kelp forest. (CDFW)

Addressing kelp declines throughout the state is a priority. In response, CDFW, in partnership with the Ocean Protection Council, is developing a statewide, ecosystem based, adaptive Kelp Restoration Management Plan (KRMP), which will be the basis for assessing and managing kelp statewide into the future. 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.

The KRMP will include a robust, adaptive, climate-ready approach to managing the state's kelp forest ecosystems in the face of changing ocean conditions. The KRMP will help identify ecological priorities, site selection criteria, and management frameworks to guide future kelp management and restoration activities. Furthermore, as resources become available, CDFW plans to develop a decision-making framework for considering restoration activities more broadly within the state's MPAs (DMR Recommendation 18), recognizing that one of the mandates of the MLPA is that MPAs act as living laboratories where research and monitoring can occur without the influence of human activities.

THE FUTURE OF MPA SCIENCE

California's MPA Network was designed using the best available science to create an ecologically connected system of protected areas along more than 1,000 miles of coastline. Results of the 2022 DMR indicate that the MPA Network's foundational design is functioning as intended, with many MPAs showing measurable ecological benefits.

As the MPA Network matures, the focus of MPA science has shifted toward evaluations of performance and function. The DMR's 28 strategic recommendations provide the roadmap for next steps. Some of the science priorities include maintaining continuity in long-term habitat monitoring, understanding the mechanisms underlying MPA performance, improving knowledge of MPA effects on fisheries and stock status, and exploring the role of MPAs as climate adaptation tools.

The priorities ahead reflect the relatively young age of the MPA Network and existing knowledge gaps in the face of a changing ocean. The 2014-2016 MHW drove dramatic declines in kelp across California, illustrating that habitats inside and outside MPAs are vulnerable to large-scale disturbance, while also highlighting the importance of understanding the localized drivers that may support resilience and recovery. Work has begun to understand how climate change and MPAs interact within the context of California's MPA Network, based on the recommendations in the Climate Resiliency and MPAs Working Group Report. One example is the ShoreCast tool, a decision support system that provides access to California rocky intertidal data to explore biodiversity and larval connectivity across MPAs and non-MPA areas, as well as the effects of sea level rise on species distributions.

Adaptive management of California's MPA Network requires recognizing appropriate time scales for detecting change and continuing to address key information gaps in partnership with tribes, local communities, fellow agencies, and other interested parties. Sustained investment in long-term monitoring, emerging technologies, and collaborative science will deepen our understanding of how California's MPAs function, connect, and respond to changing ocean conditions. Strengthening outreach and enforcement efforts and advancing opportunities for tribal co-stewardship will expand our knowledge of the ways in which people use, access, and value MPAs. Together, progress across the social and ecological dimensions of MPA management will help ensure that California's MPA Network continues to fulfill both the goals of the MLPA and the needs of current and future generations.



Tidepooling at Cabrillo Beach. (K. Gonzales)

APPENDIX A: LEVELS OF PROTECTION BY ACTIVITY AND MLPA REGION

NORTH COAST

Table A1. Level of protection, MPA type, and associated activities (species and gear) established during the MLPA North Coast Study Region planning process (excerpted from the California MLPA Master Plan Science Advisory Team's "Methods Used to Evaluate Marine Protected Area Proposals in the MLPA North Coast Study Region"). Some activities may not conform to existing commercial and recreational allowances. Updates to scientific names since the planning process are not reflected here.

Color Code	Level of Protection	MPA Types	Activities Associated with this Protection Level
	Very High	SMR	No take
	High	SMCA SMP	Salmon and other pelagic finfish[a] (H&L or troll in waters >50 m depth); pelagic finfish[a] except salmon (spearfishing); coastal pelagic finfish[b] (H&L, round-haul net, dip net, cat net, hand); Pacific lamprey (H&L, hand harvest, spear, bow and arrow, dip net); eulachon (dip net); non-living shells (hand)
	Moderate-high	SMCA SMP	Dungeness crab (trap, hoop-net, diving, hand); salmon and other pelagic finfish[a] (troll in waters <50 m depth); surf and night smelts (dip net, a-frame net, cat net); sharks, skates, and rays (spear, harpoon, bow and arrow in non-estuarine waters); trout except steelhead rainbow trout (H&L); California halibut, flounders, soles, turbots, and sanddabs (spearfishing); market squid (H&L, round-haul net, dip net, cast net, hand)
	Moderate	SMCA SMP	Redtail surfperch (H&L from shore); surfperch (H&L from shore); California halibut, flounders, soles, turbots, and sanddabs (H&L); coonstripe shrimp and spot prawn (trap); clams (intertidal hand); nori/laver and sea lettuce (intertidal hand); salmon and other pelagic finfish[a] (H&L in waters <50 m depth); white sturgeon (H&L); sharks, skates, and rays (H&L)
	Moderate-low	SMCA SMP	Pacific halibut (H&L); rockfishes, cabezon and other sculpins, lingcod and other greenlings, California moray eel, wolf eel, and monkeyface and rock prickleback (H&L, spearfishing, trap, hand, bow and arrow); red abalone (free-diving); urchin (diving); surfperch (H&L); shiner surfperch (H&L, dip net, cast net); unspecified finfish (H&L, spearfishing); sharks, skates, and rays (H&L, spear, harpoon, bow and arrow in estuarine waters); limpets and turban snails (hand); octopus (H&L, hand); crabs (trap, hoop net, hand); Turkish towel and Mendocino grapestone[d] (intertidal hand)
	Low	SMCA SMP	Rock scallop (diving); mussels (hand); bull kelp (hand); ghost shrimp (hand); sea palm (intertidal hand); canopy-forming algae[e] (intertidal hand); native oysters (hand); unspecified shrimps (hand); unspecified marine invertebrates (hand); unspecified marine algae (hand)

SMR = state marine reserve, SMCA = state marine conservation area, SMP = state marine park, H&L = hook and line, m = meters

The SAT is currently reviewing the level of protection for numerous activities; this table will be updated as activities are reviewed and approved by the SAT. It should be noted that staff is working with the SAT to coordinate terminology for particular gear types that is consistent with both the activities being proposed by the NCRSG and as defined in regulations under California Fish and Game Code. Thus the descriptions here may change in a future version of this document.

[a] The grouping "pelagic finfish" includes: 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), and yellowtail (Seriola lalandi). *Marlin is not allowed for commercial take.*

[b] The grouping "coastal pelagic finfish" includes: Northern anchovy (Engraulis mordax), Pacific herring (Clupea pallasii), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), and Pacific sardine (Sardinops sagax).

[c] Porphyra spp. (Nori, Laver), Ulva spp. (Sea Lettuce).

[d] Chondracanthus/Gigartina exasperata (Turkish Towel), and Mastocarpus spp. (Mendocino Grapestone).

[e] The grouping "canopy-forming algae" includes the following harvested groups: Alaria spp. (Wakame), Lessoniopsis littoralis (Ocean Ribbons), Laminaria spp. (Kombu), Saccharina/Hedophyllum sessile ('Sweet' Kombu), Egregia menziesii (Feather Boa), and Fucus spp. (Bladder Wrack or Rockweed).

NORTH CENTRAL COAST

Table A2. Level of protection, MPA type, and associated activities (species and gear) established during the MLPA North Central Coast Study Region planning process (excerpted from the California Marine Life Protection Act Initiative's "Methods Used to Evaluate MPA Proposals in the North Central Coast Study Region"). Some activities may not conform to existing commercial and recreational allowances. Updates to scientific names since the planning process are not reflected here.

Color Code	Level of Protection	MPA Types	Activities Associated with this Protection Level
	Very High	SMR	No take
	High	SMCA SMP	In water depth > 50m: pelagic finfish[a] by hook and line (salmon by troll only); coastal pelagic finfish[b] by seine
	Moderate-high	SMCA SMP	In water depth < 50m: pelagic finfish by hook and line (salmon by troll only); coastal pelagic finfish by seine; Dungeness crab (traps/pots), squid (pelagic seine)
	Moderate	SMCA SMP	Salmon (non-troll H&L); abalone (diving); halibut, white seabass, shore-based finfish, croaker, and flatfishes (H&L); smelt (H&L and hand/dip nets); clams (hand harvest); giant kelp (hand harvest)
	Moderate-low	SMCA SMP	Urchin (diving); lingcod, cabezon, greenling, rockfish, and other reef fish (H&L); surfperches (H&L)
	Low	SMCA SMP	Bull kelp and mussels (any method); all trawling; giant kelp (mechanical harvest); mariculture (existing methods)

[a] *Pelagic finfish: 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), and yellowtail (Seriola lalandi). *Marlin is not allowed for commercial take.*

[b] *Coastal pelagic finfish: northern anchovy (Engraulis mordax), Pacific herring (Clupea pallasii), jack mackerel (Trachurus symmetricus), Pacific mackerel (Scomber japonicus), and Pacific sardine (Sardinops sagax).*

CENTRAL COAST

Table A3. Level of protection, MPA type, and associated activities (species and gear) established during the MLPA Central Coast Study Region. Some activities may not conform to existing commercial and recreational allowances. Updates to scientific names since the planning process are not reflected here.

Color Code	**Level of Protection**	**MPA Types**	**Activities Associated with this Protection Level** [gear assumed, not specified during planning for this region]
	Very High	SMR	No take.
	High	SMCA	In water depths > 50 m: Take of salmon, albacore, and pelagic finfish[a].
	Moderate-high		NA
	Moderate	SMCA	In water depths < 50 m [inferred based on High LOP above, not explicitly stated in doc]: Take of salmon, albacore, pelagic finfish, squid; [Dungeness] crab, spot prawn, and giant kelp (hand harvested only).
	Moderate-low		NA
	Low	SMCA	[All other remaining] forms of commercial and recreational take; mechanical harvest of kelp.

[a] Pelagic Finfish are defined as: 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), and yellowtail (*Seriola lalandi*). *Marlin is not allowed for commercial take.

SOUTH COAST

Table A4. Level of protection, MPA type, and associated activities (species and gear) established during the MLPA South Coast Study Region (excerpted from the California Marine Life Protection Act Initiative's "Methods Used to Evaluate Marine Protected Area Proposals in the MLPA South Coast Study Region"). Some activities may not conform to existing commercial and recreational allowances. Updates to scientific names since the planning process are not reflected here.

Color Code	Level of Protection	MPA Types	Activities Associated with this Protection Level
	Very High	SMR	No take
	High	SMCA SMP	Coastal pelagic finfish, bonito, and market squid (pelagic seine [round haul net], dip-net, crowder); jumbo squid (squid jigs); swordfish (harpoon); In water depth > 50m: pelagic finfish, bonito and white seabass (H&L; spear at any depth)
	Moderate-high	SMCA SMP	Catch and release in <10m water or using surface gear (H&L single barbless hooks and artificial lures only); pier-based fishing (H&L, hoop-net); halibut (spear); In water depth 30<50m on mainland: pelagic finfish, bonito and white seabass (H&L)
	Moderate	SMCA SMP	Spot prawn (trap/pots); sea cucumber (scuba/hookah); grunion (hand harvest); giant kelp (hand harvest); clams (hand harvest)
	Moderate-low	SMCA SMP	Catch and release in >10m (H&L); shore-based finfish (H&L); kelp bass, barred sand bass, lingcod, cabezon, and rockfish (H&L, spear); sheephead (H&L, spear, trap); spotted sand bass and halibut (H&L); lobster (trap, hoop net, scuba); urchin (scuba/hookah); rock crab and Kellet's whelk (trap); In water depth <50m at islands and <30m on mainland: pelagic finfish, bonito and white seabass (H&L)
	Low	SMCA SMP	Rock scallop (scuba); mussels (hand harvest); giant kelp (mechanical harvest); marine algae other than giant and bull kelp (hand harvest)

H&L = hook and line.

The SAT is currently reviewing the level of protection for numerous activities, this table will be updated as activities are reviewed and approved by the SAT. It should be noted that staff is working with the SAT to coordinate terminology for particular gear types that is consistent with both the activities being proposed by the RSG and as defined in regulations under California Fish and Game Code. Thus the descriptions here may change in a future version of this document.

APPENDIX B: MPA ATTRIBUTES

Table B1. Attributes of California MPAs (special closures not included), including planning process study region, bioregion, level of protection (LOP), size, depth range, and total amounts of key habitats. Backbone MPAs are shown in bold.

											Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
North Bioregion																		
Pyramid Point SMCA	NC	Mod-High	13.99	0	40.76	2.98		1.27			1.47				1.90	1.00		
Point St. George Reef Offshore SMCA	NC	Mod-High	9.52	49.38	121.89							0.40				7.39	1.73	
Reading Rock SMCA	NC	Mod-High	11.96	0	54.13	2.90	0.22	0.51		<0.01		<0.01			3.01	3.65		
Reading Rock SMR	NC	Very High	9.60	41.36	81.9							0.24				9.35		
Samoa SMCA	NC	Mod-High	13.06	0	50.52	3.69									3.65	5.97		
South Humboldt Bay SMRMA	NC	Very High	0.81	0	4.24					0.81								
South Cape Mendocino SMR	NC	Very High	9.08	0	87.07	1.59	0.65	3.66			0.15	3.28			1.33	3.47		
Mattole Canyon SMR	NC	Very High	9.79	27.09	558.65							0.56	0.15	0.02		5.64	1.75	1.58
Sea Lion Gulch SMR	NC	Very High	10.42	0	118.46	2.42	2.32	2.78	0.11		0.54	3.13	0.12		2.07	3.59	1.00	
Big Flat SMCA	NC	Mod-High	11.59	0	423.47	3.21	1.35	0.10	0.05		0.44	0.02	0.01	0.01	2.47	5.06	2.92	0.57
Double Cone Rock SMCA	NC	Mod-High	18.49	0	117.15	4.66	3.25	2.34			1.81	0.09			3.13	11.20	1.97	
Ten Mile Beach SMCA	NC	Mod-High	3.54	0	89.52	1.00	0.05	<0.01		0.01					0.93	2.42		

											Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0-30 m (mi)	30-100 m (sq mi)	100-200 m (sq mi)	>200 m (sq mi)	0-30 m (mi)	30-100 m (sq mi)	100-200 m (sq mi)	>200 m (sq mi)
Ten Mile Estuary SMCA	NC	Very High	0.18	0	0	0.45	0.48			0.18								
Ten Mile SMR	NC	Very High	11.95	0	105.03	2.63	6.58	2.64	1.05	<0.01	1.48	0.52			1.65	8.08	0.40	
MacKerricher SMCA	NC	Low	2.49	0	38.35	4.23	3.71	5.02	1.30	<0.01	1.59	0.04			1.53	0.05		
Point Cabrillo SMR	NC	Very High	0.44	0	61.90	0.20	2.82	1.92	0.28		1.09							
Russian Gulch SMCA	NC	Low	0.22	0	33.95	0.11	2.60	1.11	0.74		0.59				0.01			
Big River Estuary SMCA	NC	Mod	0.13	0	0.94	0.24	0.77			0.12								
Van Damme SMCA	NC	Low	0.06	0	8.85	0.54	0.25	0.25	0.06	<0.01								
Navarro River Estuary SMCA	NC	Mod	0.09	0	0.96	0.05	0.72			0.09								
Point Arena SMCA	NCC	High	6.74	48.99	100.57							0.14				6.59		
Point Arena SMR	NCC	Very High	4.38	0	56.73	0.17	1.63	2.61	1.41		2.36	0.74			<0.01	2.13		
Sea Lion Cove SMCA	NCC	Mod-Low	0.22	0	16.18	0.36	2.26	0.79	0.26		0.18				0.05			
Saunders Reef SMCA	NCC	Mod-Low	9.36	0	85.91	1.83	4.29	1.93	2.68		2.09	0.96			0.65	5.85		
Del Mar Landing SMR	NCC	Very High	0.22	0	27.02	0.16	1.05	1.26	0.36		0.34				0.30			
Stewarts Point SMCA	NCC	Low	1.21	0	48.61	1.22	5.70	1.38	3.62		3.02	0.09			0.37	0.09		
Stewarts Point SMR	NCC	Very High	24.03	0	91.82	0.98	5.72	3.16	3.48		3.43	0.40			0.60	21.80		

												Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Salt Point SMCA	NCC	Mod-Low	1.84	0	71.06	0.62	4.28	2.34	3.35	<0.01	3.14	0.34			0.16	0.41		
Gerstle Cove SMR	NCC	Very High	0.01	0	8.08	0.04	0.27											
Russian River SMCA	NCC	Mod	0.84	0	18.97	1.51	0.53	1.03	0.02	<0.01	0.12				0.67			
Russian River SMRMA	NCC	Very High	0.36	0	1.74	1.96				0.35								
Bodega Head SMCA	NCC	Mod-High	12.31	0	83.62		0.29	0.51			0.84	3.29				7.95		
Bodega Head SMR	NCC	Very High	9.34	0	82.95	1.32	2.74	1.95			2.28	1.23			0.44	5.92		
Estero Americano SMRMA	NCC	Very High	0.13	0	1.85	0.41	0.44			0.13								
Estero de San Antonio SMRMA	NCC	Very High	0.07	0	1.61	0.60	0.48			0.07								
Point Reyes SMCA	NCC	Mod-High	12.27	14.23	66.39						0.12	0.01			0.08	11.66		
Point Reyes SMR	NCC	Very High	9.55	0	42.19	8.38	5.36	4.33	0.13	0.01	1.94	<0.01			5.88	0.61		
Estero de Limantour SMR	NCC	Very High	1.45	0	2.13	3.35	2.17			1.41								
Drakes Estero SMCA	NCC	Mod	2.50	0	1.70	2.28	5.00			2.50								
Duxbury Reef SMCA	NCC	Mod	0.69	0	5.67	3.02	3.03		0.02									
North Farallon Islands SMR	NCC	Very High	18.07	0	86.04		0.66	0.21			1.51	0.55			0.34	17.29		

MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	Hard Substrate				Soft Substrate			
											0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Southeast Farallon Island SMCA	NCC	High	12.95	39.23	118.85							1.60				8.41	2.94	
Southeast Farallon Island SMR	NCC	Very High	5.36	0	75.44	0.08	6.01				2.89	1.13			0.53	2.19		
Central Bioregion																		
Montara SMR	NCC	Very High	11.81	0	51.21	2.14	3.45	1.89	0.59		3.44	0.24			0.23	7.59		
Pillar Point SMCA	NCC	Mod-High	6.70	0	53.54	0.07	0.32		0.03		0.79	0.24				5.46		
Año Nuevo SMR	CC	Very High	11.15	0	53.04	10.45	6.86	2.56	2.55	<0.01	3.43	0.75			2.52	1.55		
Greyhound Rock SMCA	CC	Mod	12.00	0	66.69	2.79	3.39	0.81	1.09		3.09	0.01				8.54		
Natural Bridges SMR	CC	Very High	0.25	0	3.17	3.10	3.79	1.13		<0.01								
Elkhorn Slough SMCA	CC	Low	0.22	0	7.53	0.11				0.21								
Elkhorn Slough SMR	CC	Very High	2.72	0	6.53					2.68								
Moro Cojo Slough SMR	CC	Very High	0.20	0	0					0.20								
Soquel Canyon SMCA	CC	High	22.97	73.39	652.03							0.13	0.80	1.24		12.72	3.84	4.23
Portuguese Ledge SMCA	CC	High	10.64	79.31	1512.80							0.13	0.07			1.40	5.73	3.30
Edward F. Ricketts SMCA	CC	Low	0.23	0	22.74	0.34	0.87	0.05	0.73		0.18				0.70			

												Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Lovers Point - Julia Platt SMR	CC	Very High	0.30	0	27.25	0.45	1.39	0.30	1.05		0.07				0.68	<0.01		
Pacific Grove Marine Gardens SMCA	CC	Low	0.98	0	56.44	1.56	2.30	0.35	1.88		1.17	0.11			0.69	0.09		
Asilomar SMR	CC	Very High	1.51	0	55.82	2.06	2.61	1.42	2.01		1.30	0.06			0.67	0.02		
Carmel Pinnacles SMR	CC	Very High	0.53	10.19	96.54							0.31				0.09	<0.01	
Carmel Bay SMCA	CC	Low	2.20	0	239.95	3.08	2.66	2.03	3.02	<0.01	1.55	0.14	0.02		1.37	0.34	0.08	
Point Lobos SMCA	CC	Mod	8.47	73.51	587.17							0.05	0.45			0.05	3.68	4.23
Point Lobos SMR	CC	Very High	5.50	0	177.85	2.10	13.70	5.93	4.49		5.00	1.35	0.07		0.59	2.12	0.25	
Point Sur SMCA	CC	High	10.62	41.63	236.40							0.81	0.01			9.48	0.32	<0.01
Point Sur SMR	CC	Very High	9.79	0	57.54	5.45	4.11	6.50	5.14	<0.01	3.89	0.85			1.51	2.68		
Big Creek SMCA	CC	Mod	7.85	43.94	614.00							<0.01	0.02	<0.01		1.01	0.74	6.07
Big Creek SMR	CC	Very High	14.51	0	753.24	2.79	4.71	3.58	5.29		2.31	0.04	0.01	<0.01	3.95	3.03	1.04	7.46
Piedras Blancas SMCA	CC	High	8.84	10.94	106.32							2.38				6.44	0.01	
Piedras Blancas SMR	CC	Very High	10.44	0	50.49	5.48	6.09	7.26	5.09	<0.01	4.10	0.55			2.46	2.04		
Cambria SMCA	CC	Low	6.26	0	33.71	5.30	4.11	5.80	5.63	<0.01	4.62	<0.01			1.19	0.09		
White Rock SMCA	CC	Low	2.91	0	43.51	1.55	4.02	1.31	3.64		2.96	0.09			0.72	0.37		

											Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0-30 m (mi)	30-100 m (sq mi)	100-200 m (sq mi)	>200 m (sq mi)	0-30 m (mi)	30-100 m (sq mi)	100-200 m (sq mi)	>200 m (sq mi)
Morro Bay SMR	CC	Very High	0.88	0	1.59					0.88								
Morro Bay SMRMA	CC	Low	3.07	0	9.37	1.45	0.18			3.01								
Point Buchon SMCA	CC	High	12.19	58.42	120.11							0.29	0.05			8.13	3.25	
Point Buchon SMR	CC	Very High	6.68	0	67.72	1.46	2.71	1.27	3.00		3.23	0.47			<0.01	4.46		
Vandenberg SMR	CC	Very High	32.91	0	42.03	13.18	9.99	3.80	1.28	<0.01	2.43	0.04			11.79	8.85		
South Bioregion																		
Point Conception SMR	SC	Very High	22.52	0	153.46	1.98	3.43		2.27		1.79	0.57	<0.01		2.03	15.34	3.60	
Kashtayit SMCA	SC	Mod-Low	2.02	0	52.27	1.33	1.33		0.20	<0.01					1.93	0.19		
Naples SMCA	SC	Low	2.60	0	53.00	1.55	1.38		2.07		1.52				0.54	0.41		
Campus Point SMCA (No-Take)	SC	Very High	10.56	0	230.85	3.10	1.25		2.66		1.12	0.19			2.04	6.61	1.49	0.05
Goleta Slough SMCA (No-Take)	SC	Very High	0.16	0	1.18	0.51				0.15								
Richardson Rock SMR	SC	Very High	40.75	24.79	134.49							0.20	0.04			0.52	0.09	
Harris Point SMR	SC	Very High	25.40	0	114.08	2.28	7.44		3.99		4.39	2.38	0.28		3.81	16.12	2.71	
Judith Rock SMR	SC	Very High	4.56	0	135.89	0.50	1.70		1.34		1.12	0.08			0.13	1.58		
Carrington Point SMR	SC	Very High	12.78	0	66.68	1.26	5.07		3.59		2.02	0.31			3.68	4.17		

MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	Hard Substrate				Soft Substrate			
											0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Skunk Point SMR	SC	Very High	1.47	0	27.67	1.77	0.74		0.91						2.05			
South Point SMR	SC	Very High	13.08	0	392.91	1.45	3.47		3.78		2.11	0.26	<0.01		1.67	3.57	5.70	1.63
Painted Cave SMCA	SC	Mod-Low	1.79	0	91.10		3.04		0.47		0.24	<0.01			1.91	0.09		
Gull Island SMR	SC	Very High	19.93	0	698.09	2.29	1.89		3.11		2.59	0.14	0.17	2.09	2.51	3.89	3.36	7.40
Scorpion SMR	SC	Very High	9.64	0	237.03	0.60	3.83		2.41		0.76	0.28	<0.01		2.28	4.44	1.37	0.87
Anacapa Island SMCA	SC	Mod-Low	7.30	0	125.47	0.19	3.50		1.63		0.51	0.01			1.71	5.91	0.89	
Anacapa Island SMR	SC	Very High	11.55	0	241.18	1.00	6.42		2.42		0.98	0.13			2.26	7.17	2.37	0.82
Footprint SMR	SC	Very High	7.05	49.29	534.46							0.10	0.16	0.23		1.05	1.53	3.59
Begg Rock SMR	SC	Very High	37.9 6	62.54	119.65							9.14	4.06			16.47	8.28	
Santa Barbara Island SMR	SC	Very High	12.77	0	588.62	0.15	1.03	0.03	1.04		0.07	0.11	0.02		1.21	1.63	0.46	0.04
Point Dume SMCA	SC	High	15.92	0	683.37	4.03	0.46		1.60	<0.01	0.40	<0.01	<0.01		3.80	5.69	1.57	5.66
Point Dume SMR	SC	Very High	7.53	0	649.43	2.56	1.34		1.29		0.54	<0.01	<0.01		1.71	1.04	0.72	4.42
Point Vicente SMCA (No-Take)	SC	Very High	15.04	0	826.82	1.35	0.21	0.42	1.77		1.62	<0.01	<0.01	<0.01	0.07	1.17	0.99	12.22
Abalone Cove SMCA	SC	High	4.79 4	0	627.79	1.43	0.86	0.09	1.08		0.28	0.05			1.04	1.16	0.57	2.37
Bolsa Bay SMCA	SC	Mod-Low	0.07	0	0.31	0.12				0.07								

MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	Hard Substrate				Soft Substrate			
											0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Bolsa Chica Basin SMCA (No-Take)	SC	Very High	0.70	0	1.73	1.15				0.70								
Arrow Point to Lion Head Point SMCA	SC	Low	0.65	0	84.07	1.17	2.42		2.52		2.11	<0.01			0.86	0.24		
Blue Cavern Offshore SMCA	SC	High	7.70	80.02	888.28									<0.01		0.05	0.26	7.38
Blue Cavern Onshore SMCA (No-Take)	SC	Very High	2.61	0	273.54	0.75	1.90		2.33		1.38	0.02		<0.01	1.32	0.85	0.81	0.70
Long Point SMR	SC	Very High	1.67	0	226.10	1.07	1.22	0.04	0.17		0.73	<0.01	<0.01		1.63	0.83	0.56	0.10
Casino Point SMCA (No-Take)	SC	Very High	0.007	10.98	18.72				0.12		0.11				0.04	<0.01		
Lover's Cove SMCA	SC	Mod-High	0.06	0	60.11	0.38	0.12	0.06	0.08		0.26	<0.01			0.22	0.02		
Farnsworth Offshore SMCA	SC	High	6.67	32.96	672.76							0.52	<0.01	0.02		3.31	1.83	0.99
Farnsworth Onshore SMCA	SC	Mod-High	2.59	0	89.96	1.84	1.57		1.45		0.21	0.02			2.02	1.77		
Cat Harbor SMCA	SC	Mod-Low	0.26	0	53.65	1.80	0.84	0.03	0.37		0.18	<0.01			0.65	0.03		
Upper Newport Bay SMCA	SC	Mod-Low	1.24	0	4.00	1.19	0.25			1.22								
Crystal Cove SMCA	SC	Mod-Low	3.53	0	70.59	3.94	2.03	0.58	1.73	<0.01	1.89	<0.01			2.41	1.46		
Laguna Beach SMR	SC	Very High	6.72	0	457.85	3.48	2.48	0.27	1.96	<0.01	1.47	<0.01			3.05	2.88	1.13	0.57

											Hard Substrate				Soft Substrate			
MPA Name	Study Region	LOP	Size (sq mi)	Min Depth (m)	Max Depth (m)	Beach (mi)	Rocky Shore (mi)	Offshore Rocks (mi)	Kelp Canopy (mi)	Estuaries (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)	0–30 m (mi)	30–100 m (sq mi)	100–200 m (sq mi)	>200 m (sq mi)
Laguna Beach SMCA (No-Take)	SC	Very High	3.09	0	523.32	0.67	0.38			<0.01	0.16	<0.01			0.89	0.94	0.57	1.04
Dana Point SMCA	SC	Mod-Low	3.47	0	46.81	3.55	2.18		2.26	<0.01	2.06	<0.01			1.62	0.82		
Batiquitos Lagoon SMCA (No-Take)	SC	Very High	0.51	0	0					0.50								
Swami's SMCA	SC	Mod-Low	12.71	0	326.81	2.68	0.90		2.57	<0.01	0.06	0.06	0.02	<0.01	3.52	3.69	3.51	1.94
San Elijo Lagoon SMCA (No-Take)	SC	Very High	0.50	0	0					0.50								
San Dieguito Lagoon SMCA	SC	Mod-Low	0.19	0	0					0.11								
San Diego-Scripps Coastal SMCA	SC	Mod-Low	1.46	0	187.06	1.19	0.19								1.55	0.71	0.02	
Matlahuayl SMR	SC	Very High	1.04	0	185.26	1.23	0.92	0.04	0.32		0.05				1.34	0.33	<0.01	
South La Jolla SMCA	SC	High	2.46	43.76	84.34							0.60				1.85		
South La Jolla SMR	SC	Very High	5.04	0	55.68	2.33	1.45	0.38	2.32		1.89	0.38			0.23	1.00		
Famosa Slough SMCA (No-Take)	SC	Very High	0.03	0	0					0.03								
Cabrillo SMR	SC	Very High	0.39	0	13.03	0.90	0.97											
Tijuana River Mouth SMCA	SC	High	3.02	0	17.28	2.37			0.12	<0.01	0.17				1.40			

APPENDIX C: HABITAT SPACING MAPS

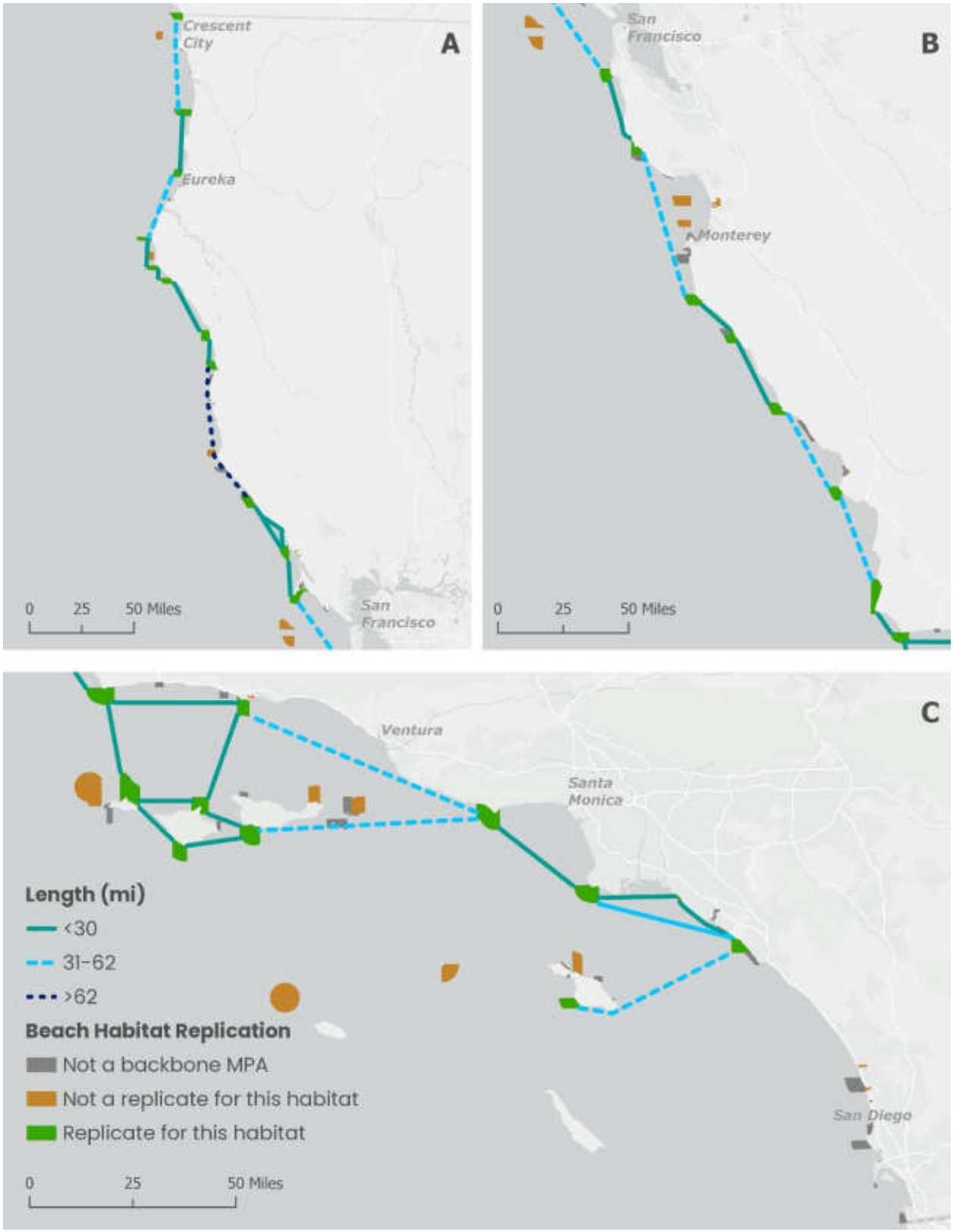


Figure C1. Linear over-water distance (miles) between California MPA replicates for beach habitat in the (a) North, (b) Central, and (c) South bioregions.

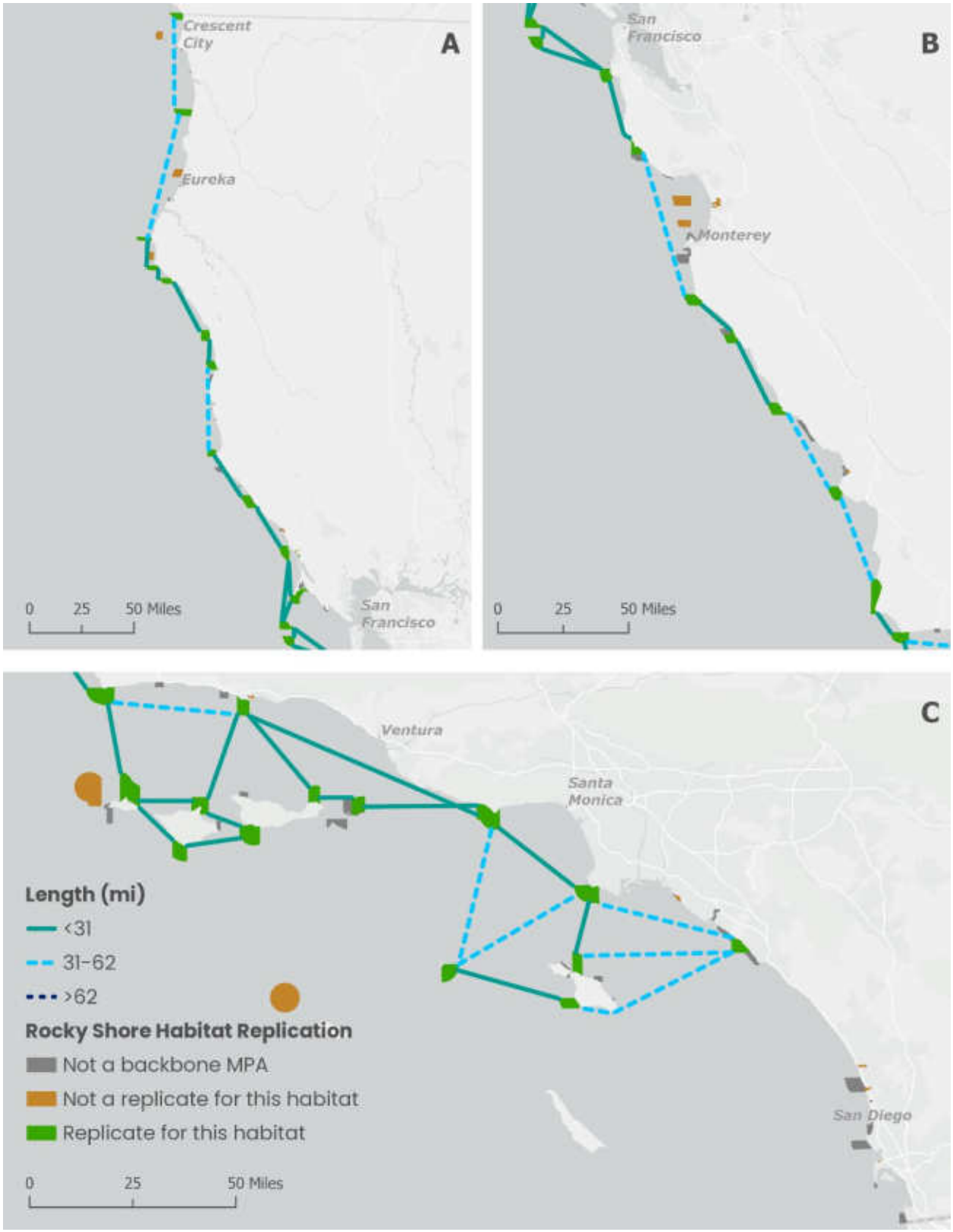


Figure C2. Linear over-water distance (miles) between California MPA replicates for rocky shore (including offshore rock) habitat in the (a) North, (b) Central, and (c) South bioregions.

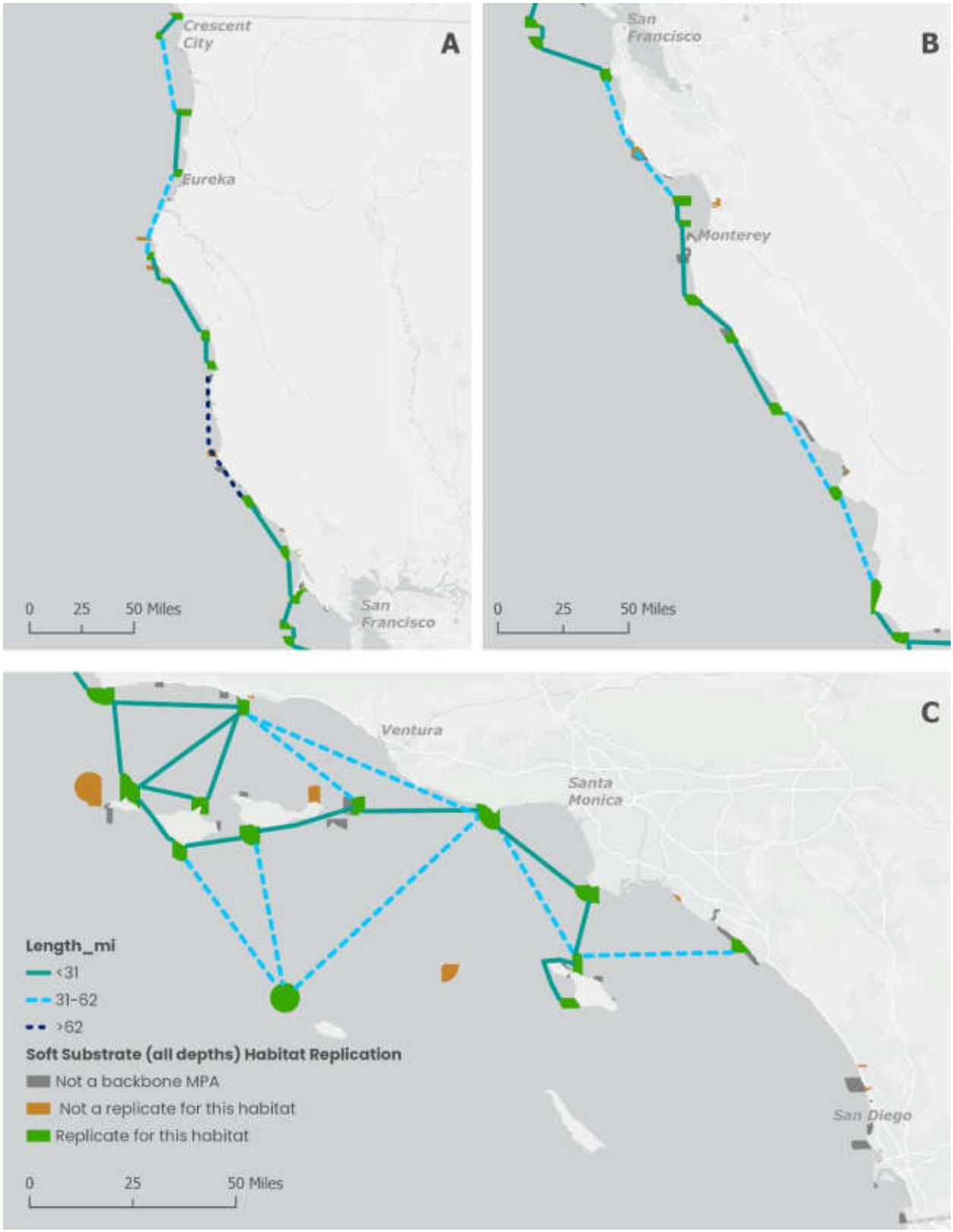


Figure C3. Linear over-water distance (miles) between California MPA replicates for soft substrate (total area, all depths) in the (a) North, (b) Central, and (c) South bioregions.

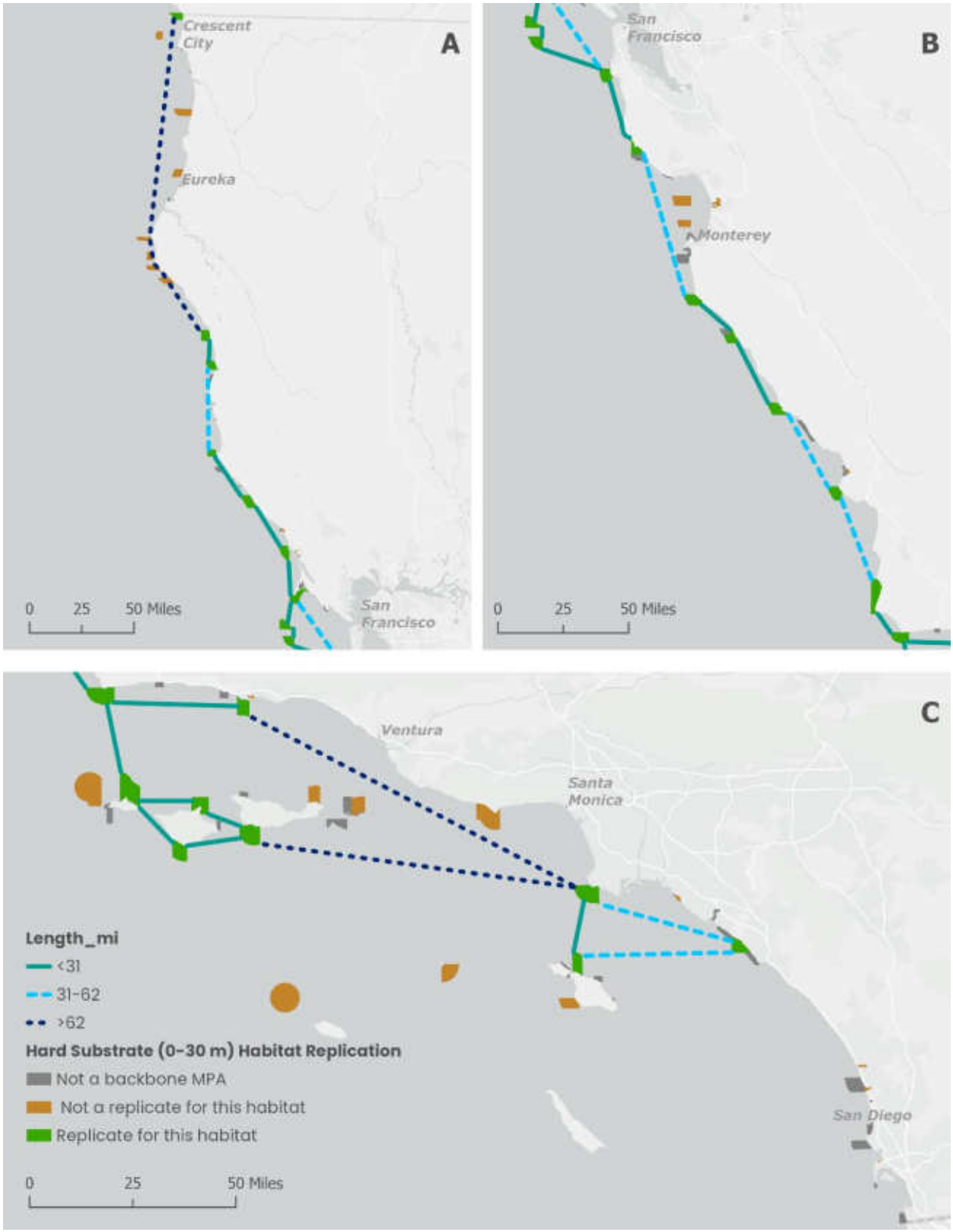


Figure C4. Linear over-water distance (miles) between California MPA replicates for hard substrate (0-30 m) habitat in the (a) North, (b) Central, and (c) South bioregions.

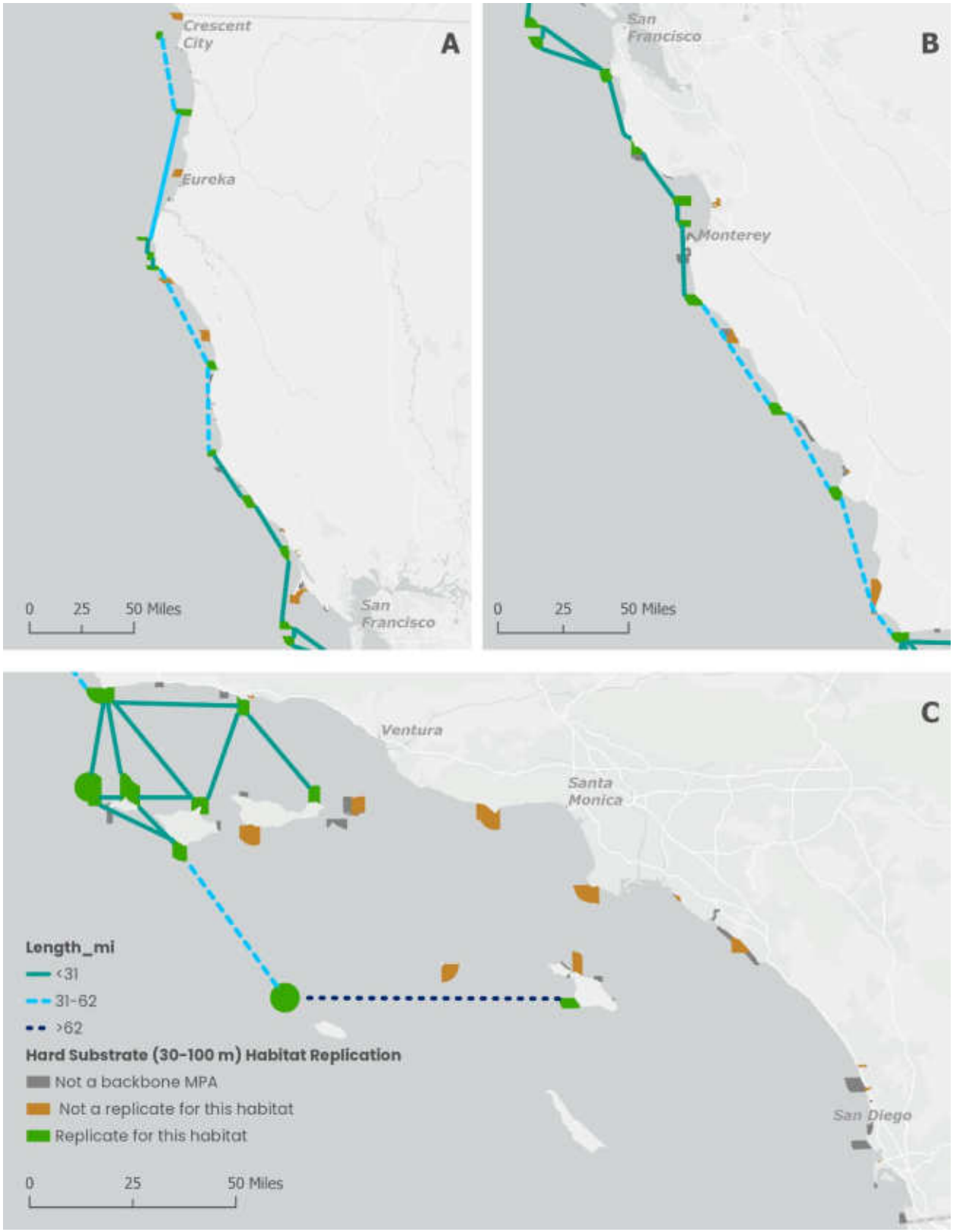


Figure C5. Linear over-water distance (miles) between California MPA replicates for hard substrate (30-100 m) habitat in the (a) North, (b) Central, and (c) South bioregions.

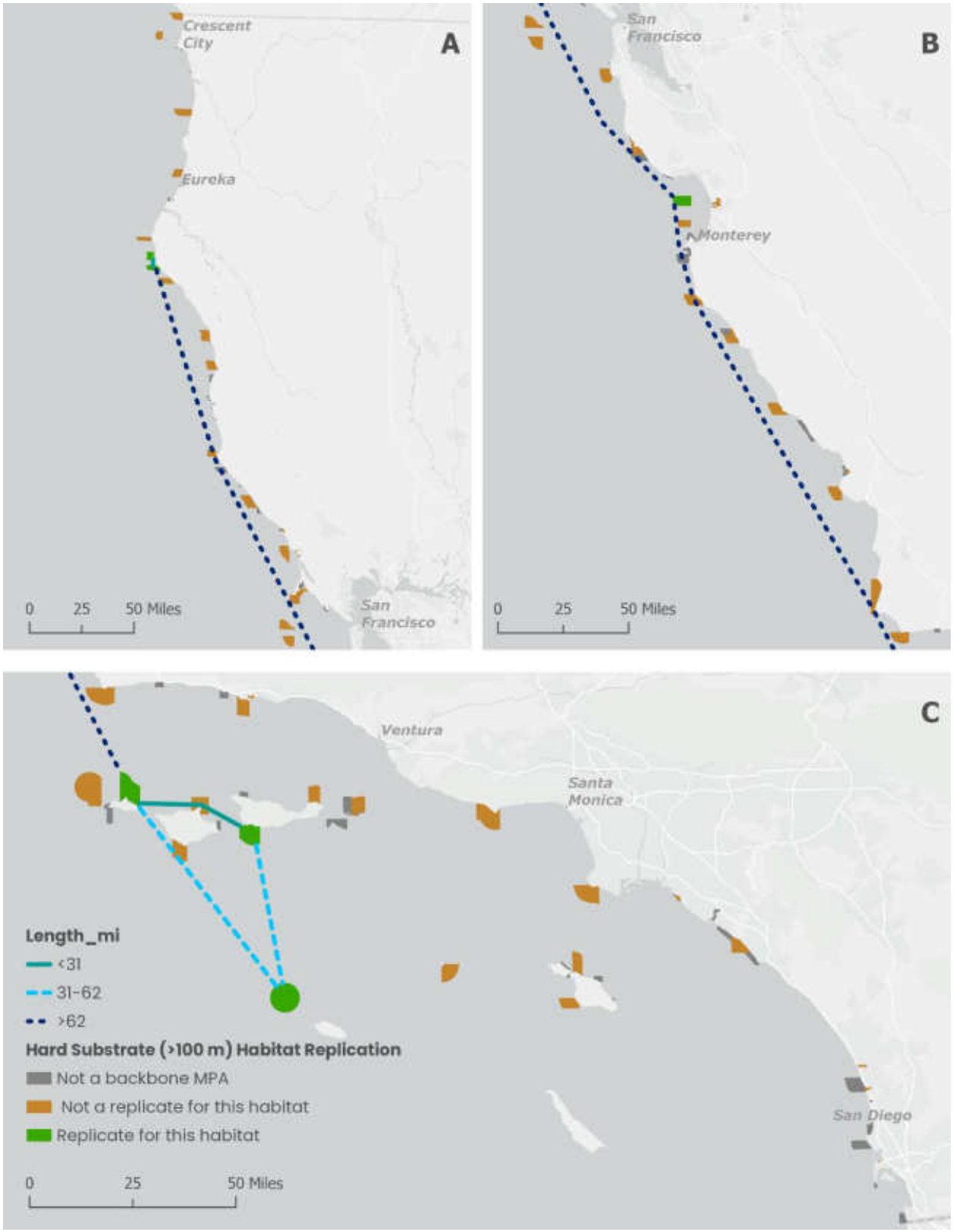


Figure C6. Linear over-water distance (miles) between California MPA replicates for hard substrate (>100 m) habitat in the (a) North, (b) Central, and (c) South bioregions.

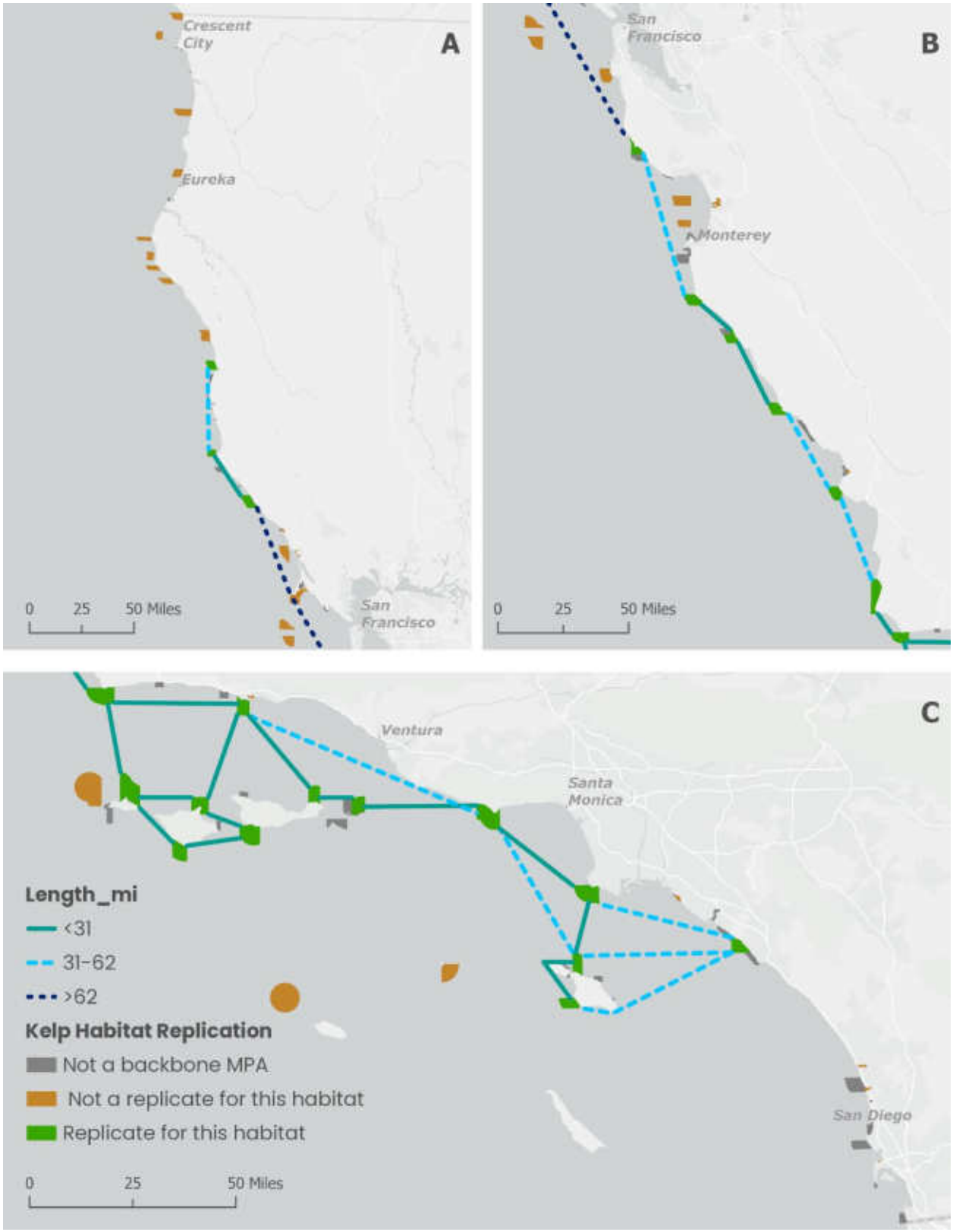


Figure C7. Linear over-water distance (miles) between California MPA replicates for kelp canopy coverage in the (a) North, (b) Central, and (c) South bioregions.

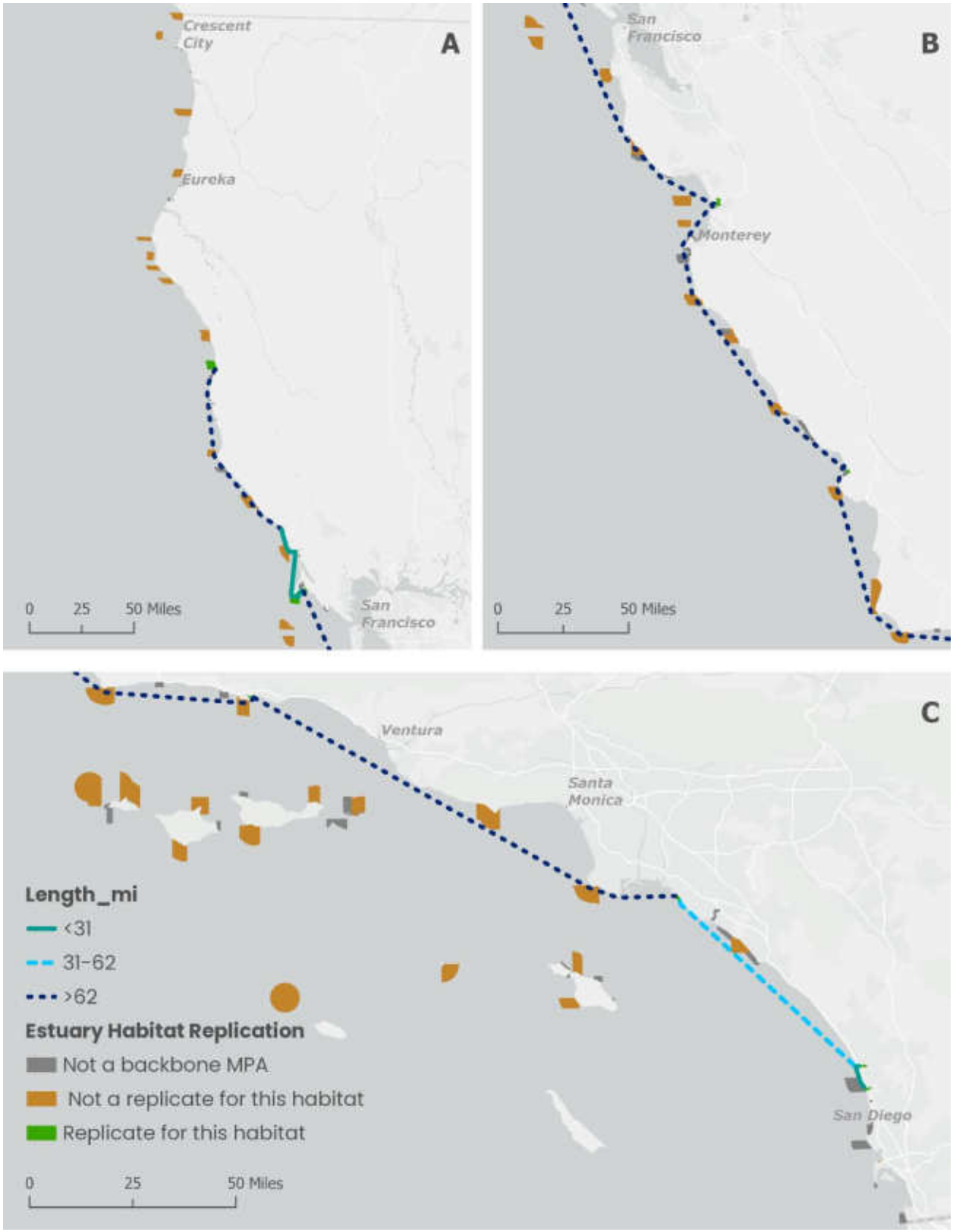


Figure C8. Linear over-water distance (miles) between California MPA replicates for estuarine habitat in the (a) North, (b) Central, and (c) South bioregions.



2023 BIN 2 MPA PETITIONS

Evaluations and Recommendations for Tribally-led Petitions

Dr. Craig Shuman

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

August 11, 2026 CFGC Tribal Committee Meeting
August 12, 2026 CFGC Meeting

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

MPA Network Management

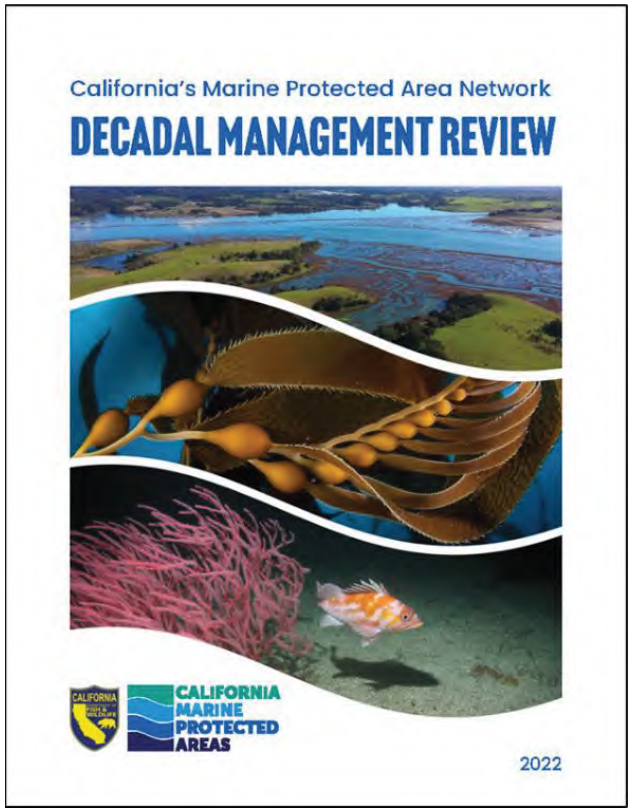
Adaptive Process

- Long-term scientific monitoring
- Periodic Review: data expertly evaluated
- Ongoing, across all Management Pillars
  - Regulatory
  - Non-regulatory



Decadal Management Review Key Findings

- For some species and habitats, MPAs support populations of larger and/or more abundant fish and invertebrates
  - Results vary across bioregions, habitats, and other factors
- Evidence of enhanced connectivity, ecosystem integrity, and resilience
  - MPA Network is still young, more to learn
- Did not identify performance gaps that warrant significant structural modification
- Informed 28 priority adaptive management recommendations, ~80 specific actions



2023 MPA Petition Process Milestones

Date	Milestone
Aug 2023	California Fish and Game Commission (CFGC) approves prioritization framework and to consider changes to the MPA Network using the existing CFGC petition process
Oct 2023	CFGC releases "Overview of Process to Consider Potential Changes to California's MPA Network"
Dec 2023	CFGC receives 20 MPA-related petitions with 80+ actions
Feb 2024	CFGC refers all 20 petitions to CDFW for evaluation
Apr 2024	CFGC adopts 3-phased approach to petition evaluation
Aug 2024	CFGC approves binning petitions, requests CDFW evaluate Bin 1 petitions and develop a proposed framework to evaluate Bin 2 petitions
Nov 2024	CDFW releases recommendations for five Bin 1 petitions

2023 MPA Petition Process Milestones (2/3)

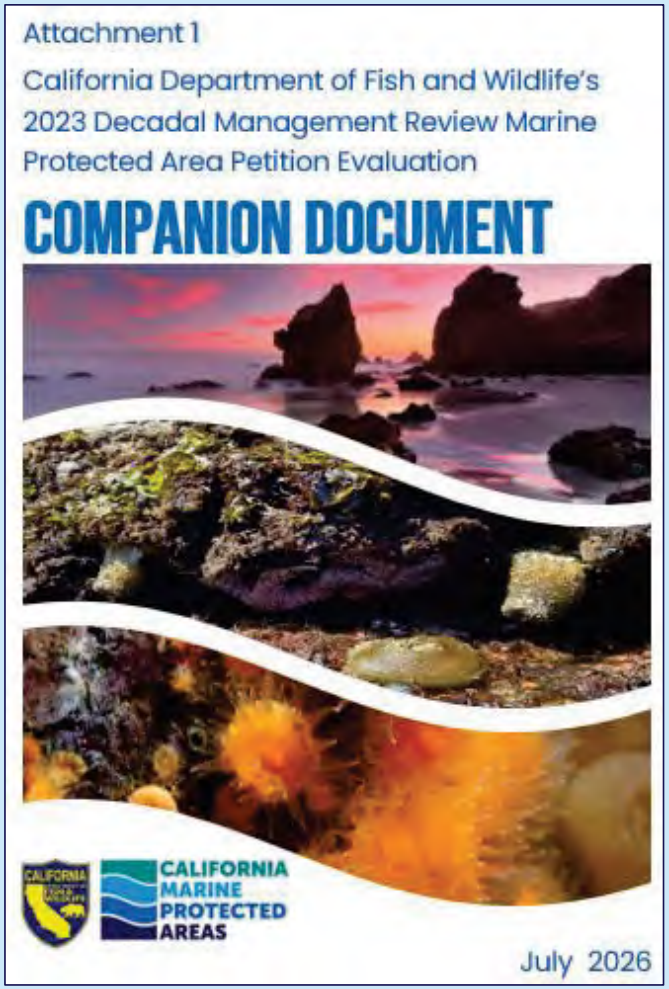
Date	Milestone
Dec 2024	CFGC makes decisions on Bin 1 petitions and establishes March 14, 2025 deadline for amendments to Bin 2 petitions
Mar 2025	Deadline for amendments to Bin 2 petitions
Apr 2025	CFGC refers amended Bin 2 petitions to CDFW for evaluation
Apr-May 2025	CDFW develops Draft Bin 2 Petition Evaluation Framework with Ocean Protection Council and CFGC staff
May 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions and proposed approach for evaluations
Aug 2025	• Update and discussion on MPA petitions and Draft Eval Framework at CFGC TC • CFGC TC identifies four Tribally-led petitions
Aug 2025	CFGC approves framework for evaluating Bin 2 petitions

2023 MPA Petition Process Milestones (3/3)

Date	Milestone
Dec 2025	Update and discussion at CFGC TC on Bin 2 MPA petitions; identifies one more Tribally-led petition; directs CDFW to come back to April 2026 CFGC TC to discuss MPA Petitions
Mar 2026	CDFW releases evaluations and Companion Document for the ten non-Tribally-led Bin 2 MPA Petitions for the 64 proposed actions
Apr 2026	Update and discussion at CFGC TC on Bin 2 MPA petitions Tribally-led petitions amended and referred to CDFW
Apr – May 2026	Regional CFGC Petition Discussion Meetings • April 21, San Mateo: Del Norte through Monterey counties, • May 5-6, Goleta: San Luis Obispo through Santa Barbara counties, including the Northern Channel Islands • May 19, San Clemente: Los Angeles through San Diego counties, and Santa Catalina Island
July 2026	CDFW releases evaluations for the five Tribally-led Bin 2 MPA Petitions

2023 MPA Bin 2 Petition Evaluation Companion Document

- History of MPA Network Adaptive Management
- Supplemental information, reference materials, and additional context for evaluations
- July Updates:
  - 2023 MPA Petition milestones
  - Tribal outreach and engagement
  - Climate Resilience and MPAs
  - Additional information for Question 5 (information gaps) and Question 9 (MPA Network design and Levels of Protection)



CDFW Tribal Outreach – 2023 MPA Bin 2 Petitions

- Initiated in May 2024
- Regularly provided email and mailed updates
- Distributed to CDFW Tribal Contact List (NAHC contact list and additional interested tribal contacts)
- All updates included offers for formal consultation
- Summary of outreach in Companion Document

Updates at CFGC Tribal Committee

- May 7, 2025
- August 12, 2025
- December 9, 2025
- April 14, 2026
- August 11, 2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CDFW Engagement with Tribes on Tribally-led Petitions

- September 2025 – July 2026
- CDFW met with representatives from tribes
- Purpose:
  - Better understand tribes' perspective and requests
  - Initiate discussions regarding requests for co-management
  - Clarify petition process and next steps


Photo Credit: M. Baird, CC BY 2.0

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Tribally-led 2023 Bin 2 MPA Petitions

Tribally-led Petition: A petition that was submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or has a tribal co-sponsor

- **Tolowa Dee-ni' Nation:**
  - **2023-21MPA_AM1:** Remove Recreational Take of True Smelt and Change the Boundary at Pyramid Point SMCA
- **Northern Chumash Tribal Council:**
  - **2023-28MPA_AM2:** Designate a new SMCA at Point Sal
- **Santa Ynez Band of Chumash Indians:**
  - **2023-19MPA_AM1:** Designate a new Chitqawi SMCA near Morro Bay with a Tribal Take Exemption for SYBCI
  - **2023-20MPA_AM1:** Change the Name and Add a Tribal Exemption for SYBCI at Point Buchon SMCA, and Change the Boundary at Point Buchon SMR
  - **2023-29MPA_AM2:** Designate a new SMCA near Mishopshno/Carpinteria with a Tribal Take Exemption for SYBCI

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

2023 MPA Bin 2 Petition Evaluation Framework

CGFC Approved in August 2025, includes:

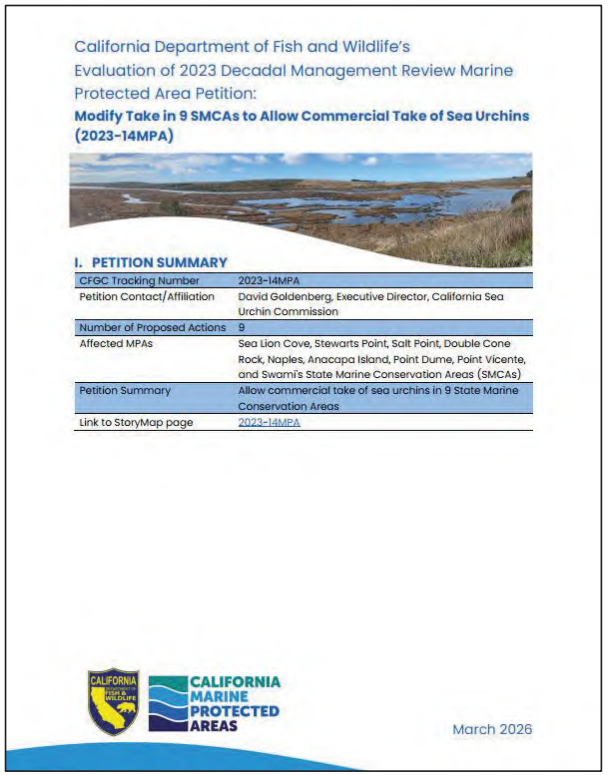
I. Petition Summary

II. CDFW Recommendations with Brief Justifications

III. Bin 2 Petition Grouping: Identify Tribally-led Petitions

IV. CDFW 2023 MPA Bin 2 Petition Narrative and Evaluation

V. Supplemental Analyses, Data and Information, and Citations



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

Modify Take in 9 SMCAs to Allow Commercial Take of Sea Urchins (2023-14MPA)

I. PETITION SUMMARY

CFGC Tracking Number	2023-14MPA
Petition Contact/Affiliation	David Goldenberg, Executive Director, California Sea Urchin Commission
Number of Proposed Actions	9
Affected MPAs	Sea Lion Cove, Stewarts Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's State Marine Conservation Areas (SMCAs)
Petition Summary	Allow commercial take of sea urchins in 9 State Marine Conservation Areas
Link to StoryMap page	2023-14MPA

CALIFORNIA MARINE PROTECTED AREAS

March 2026

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

Non-regulatory Request: Co-management

Request included in Petitions

- Santa Ynez Band of Chumash Indians
  - 19 Chitqawi SMCA
  - 20 Point Buchon SMCA
  - 29 Mishopshno SMCA
- Northern Chumash Tribal Council
  - 28 Point Sal SMCA


Courtesy of California State Parks, 2026.

CDFW Recommendation: Support with an Alternative Pathway
the non-regulatory requests to advance co-management

2023-21MPA_AM1 Pyramid Point SMCA

Remove Recreational Take of True Smelt and Change the Boundary at Pyramid Point SMCA



Submitted by: Tolowa Dee-ni' Nation

Proposed Action 2023-21MPA_1_AM1: Remove recreational take allowance for true smelt in Pyramid Point SMCA and retain the existing tribal exemption for Tolowa Dee-ni' Nation

Existing Regulations:

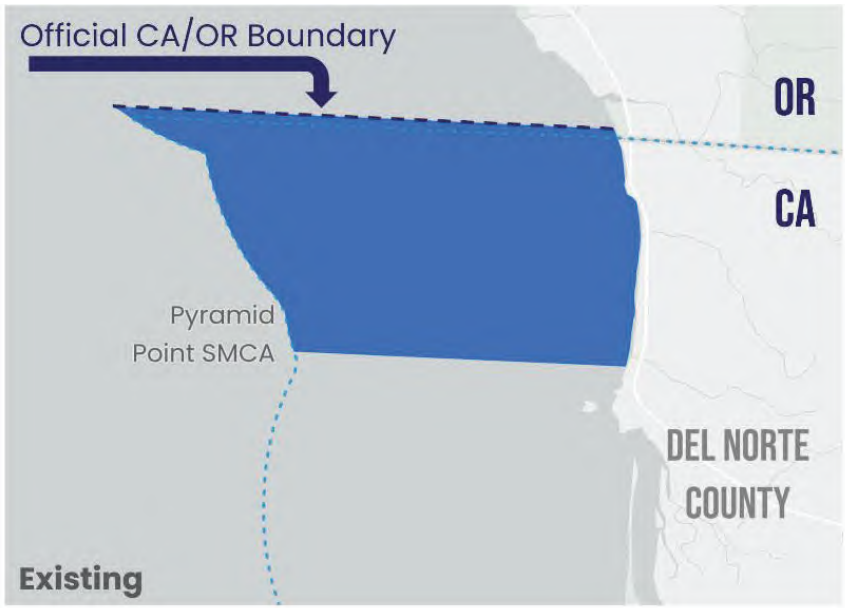
1. The recreational take of true smelt by dip net or Hawaiian type throw net is allowed
2. Tribal take exemption for Tolowa Dee-ni' Nation

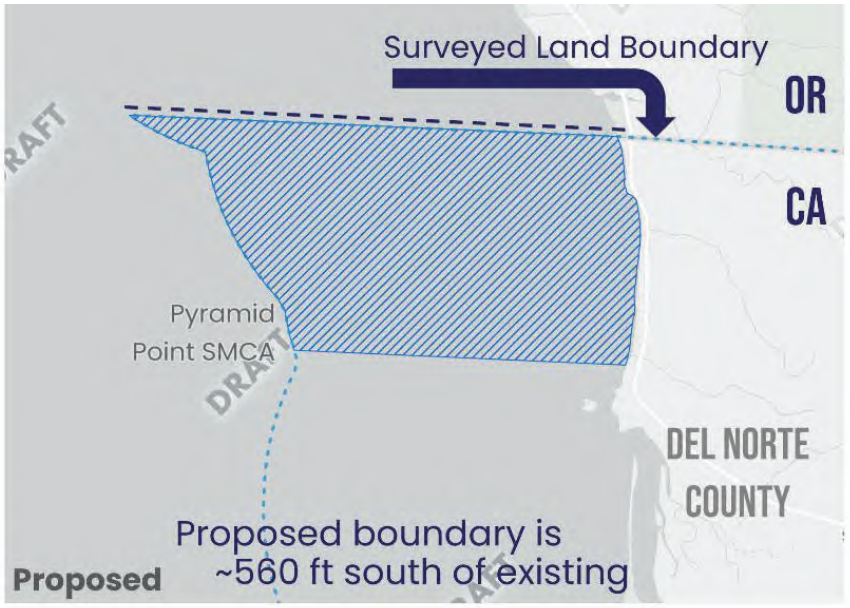
CDFW Recommendation: GRANT

Remove recreational take allowance for true smelt in Pyramid Point SMCA, retain SMCA designation and existing tribal take exemption


Ken Oda, CDFW

Proposed Action 2023-21MPA_2_AM1: Change northern boundary of Pyramid Point SMCA from the official California/Oregon state line (42°N) to align with the landside surveyed border (41°59’55”N)





CDFW Recommendation: DENY

Retain the current boundary at 42°N

2023-19MPA_AM1 New Chitqawi SMCA

Designate a new SMCA in Estero Bay named Chitqawi SMCA with no take other than a tribal take exemption for the Santa Ynez Band of Chumash Indians

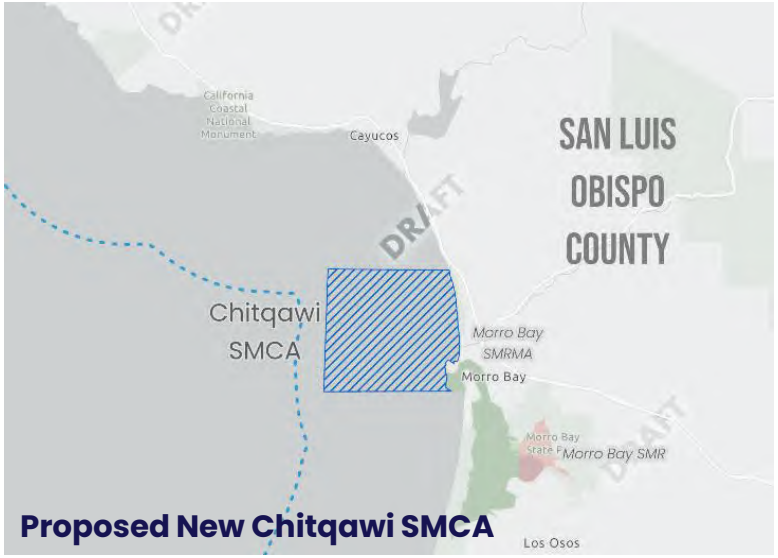


Proposed New Chitqawi SMCA

Submitted by: Santa Ynez Band of Chumash Indians

Proposed Action 2023-19MPA_1_AM1: Designate a new SMCA in Estero Bay named Chitqawi SMCA with no take other than a tribal take exemption for the Santa Ynez Band of Chumash Indians

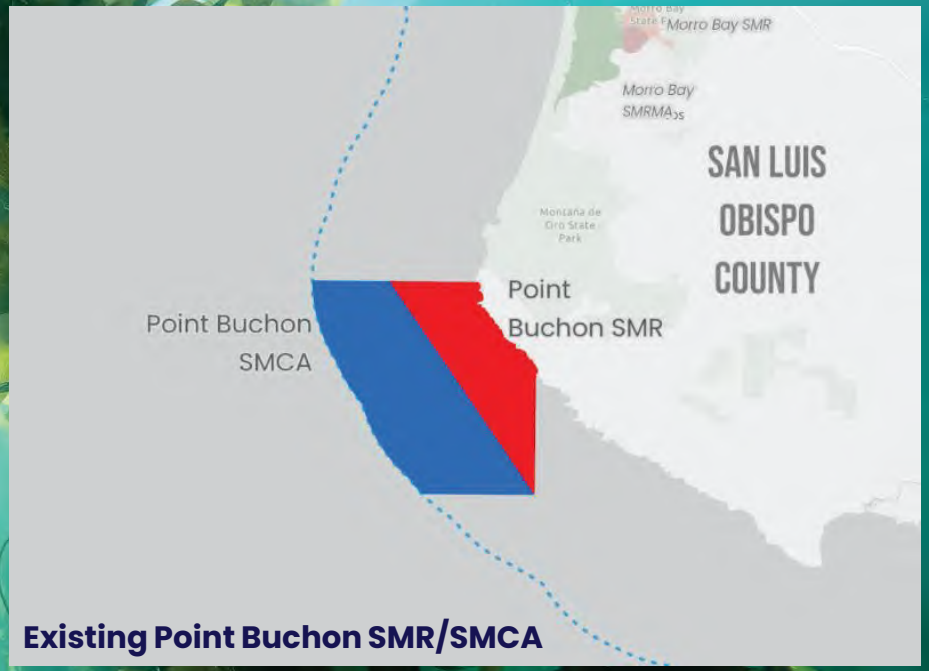




CDFW Recommendation: Support with an Alternative Pathway and request CDFW engage with the SYBCI, other interested tribes, and California State Parks to **explore designating the area as a State Marine Cultural Preservation Area** to acknowledge the cultural significance of the area, rather than establishing a new SMCA.

2023-20MPA_AM1 Point Buchon

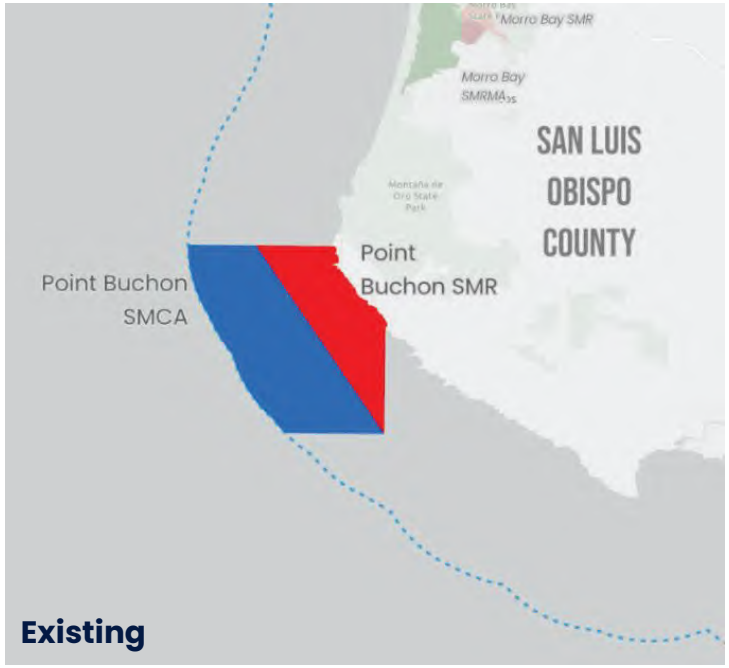
Change the Name and Add a Tribal Exemption for SYBCI at Point Buchon SMCA, and Change the Boundary at Point Buchon SMR



Existing Point Buchon SMR/SMCA

Submitted by: Santa Ynez Band of Chumash Indians

Proposed Action 2023-20MPA_2_AM1: Adjust the northern boundary of Point Buchon State Marine Reserve to align with Point Buchon





CDFW Recommendation: DENY

Retain the current northern boundary

2023-20MPA_3_AM1: Rename Point Buchon SMCA


Photo Credit: M. Baird, CC BY 2.0

CDFW Recommendation: GRANT in Concept

Work with SYBCI and other tribes to identify a new name that aligns with CFGC's Naming Protected Area Policy

Proposed Action 2023-20MPA_4_AM1: Add tribal take exemption to Point Buchon SMCA for SYBCI

Existing Regulations:

The commercial and recreational take of salmon and albacore is allowed.

Tit. 14 Cal. Code Regs. 632(94)(B)

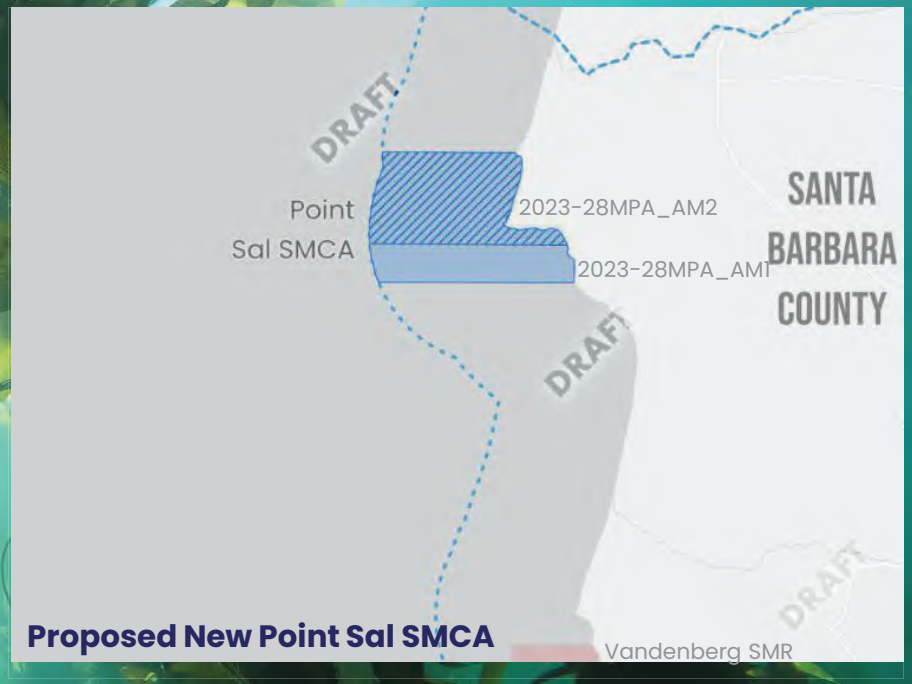


The area around Point Buchon SMR from the landward side. Photo Credit: Rose Dodgen, CDFW

CDFW Recommendation: GRANT

2023-28MPA_AM2 New Point Sal SMCA

Designate a New SMCA Near Point Sal with an Allowance for Recreational Take of Finfish by Hook-and-Line From Shore



Submitted by: Natural Resources Defense Council and co-sponsored by Northern Chumash Tribal Council

Proposed Action 2023-28MPA_1_AM2:

- Designate a new SMCA around Point Sal with an allowance for recreational take of finfish by hook-and-line from shore

- Include language to allow for take incidental to mission-critical operations at Vandenberg Space Force Base

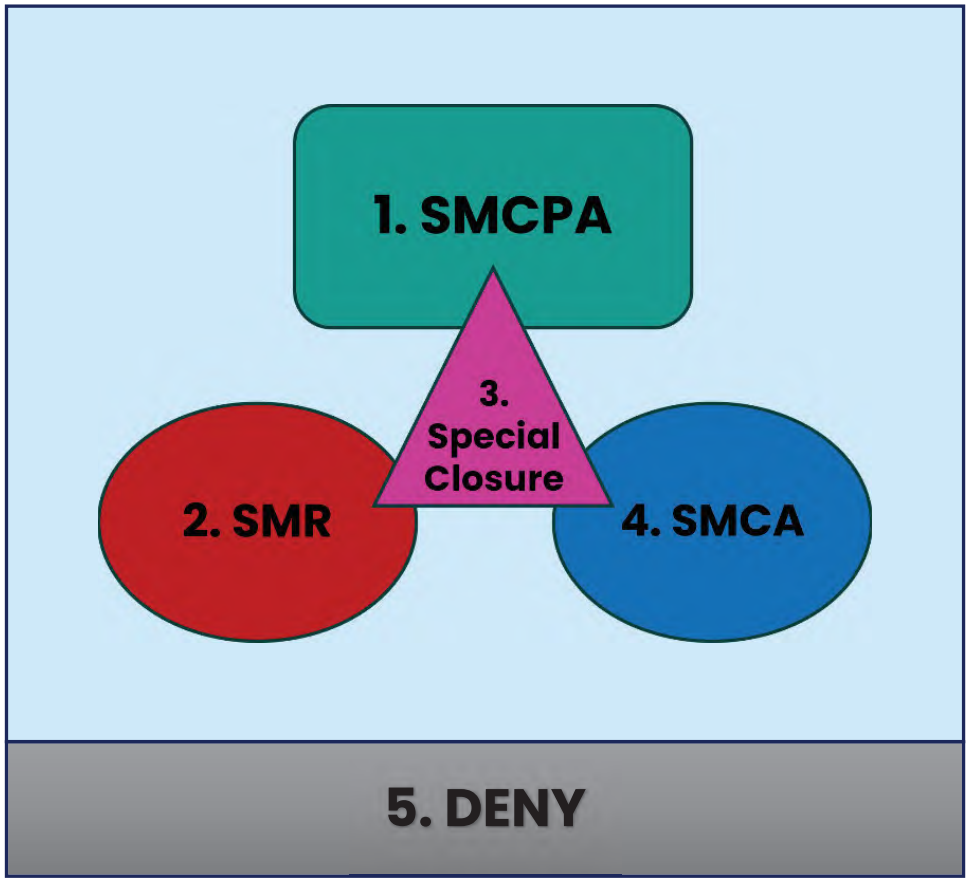
- Consult with tribes to identify a traditional tribal name for the new MPA



Courtesy of California State Parks, 2026.

CDFW Recommendation: Consider the options…

CDFW Recommendation 2023-28MPA_AM2 New Point Sal SMCA, **Consider the Following Options:**

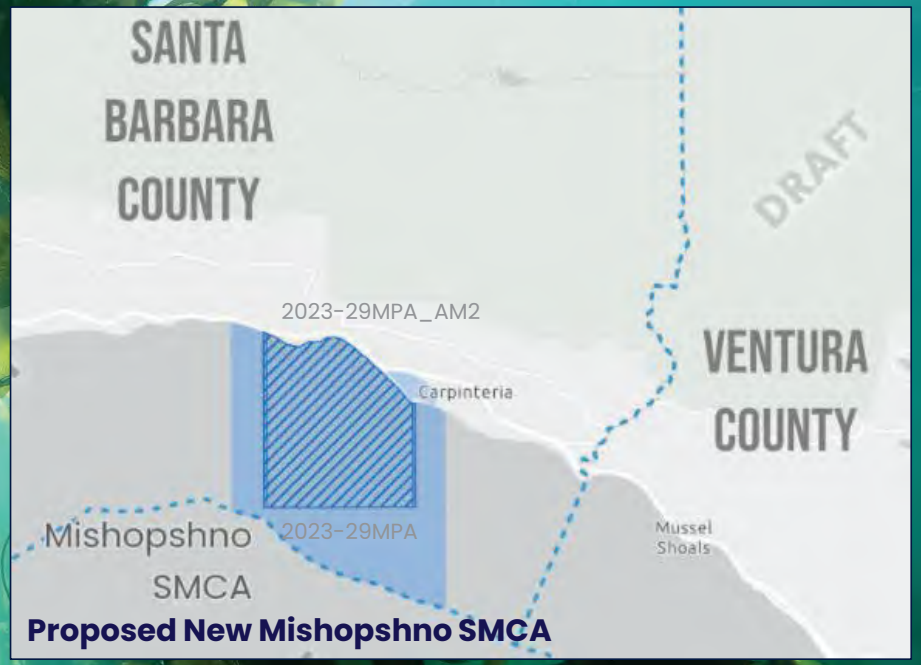


1. **Support with an Alternative Pathway** Explore designating the area as a **SMCPA**
2. **Grant with Alternative Pathway** designate a **new SMR** with modified boundaries
3. **Grant with Alternative Pathway** Designate a **new Special Closure** around Lion Rock for birds and pinnipeds
4. **Grant in Concept** Designate a **new SMCA** with recreational take of finfish by hook-and-line from shore, with modified boundaries
5. **Deny**-do not designate an MPA, Special Closure, or explore a SMCPA

SMCPA- State Marine Cultural Preservation Area; SMR-State Marine Reserve; SMCA- State Marine Conservation Area

2023-29MPA_AM2 New Mishopshno SMCA

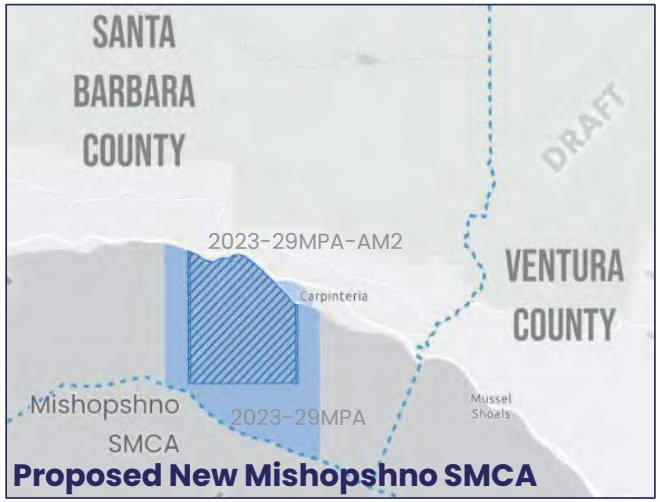
Designate a New SMCA Near Mishopshno/Carpinteria with an Allowance for Recreational Take of Finfish by Hook-and-Line From Shore and a Tribal Take Exemption for SYBCI



Submitted by: Natural Resources Defense Council, Santa Ynez Band of Chumash Indians, Environmental Defense Center

Proposed Action 2023-29MPA_1_AM2: Establish a new California-Chumash co-management MPA near Santa Barbara to be named Mishopshno that allows tribal take by members of the SYBCI, and allows recreational take of finfish from shore by hook-and-line.





CDFW Recommendation: Support with an Alternative Pathway and request CDFW engage with the SYBCI, other tribes, California State Parks, and other interested parties, to **explore designating a State Marine Cultural Preservation Area at Mishopshno** to acknowledge the cultural significance of the area without limiting fishing access to other tribes that have a historical connection to the area, or to the public.

Recap: DMR Adaptive Management Recommendations

Near-Term (ongoing – 2 years)

- Rec 1: Improve state agencies tribal engagement
- Rec 4: Apply Review knowledge to Network/Management changes
- Rec 7: Expand outreach and education materials
- Rec 9: Continue OPC coordination
- Rec 10: Improve coordination across Management Program pillars
- Rec 11: Update Action Plan
- Rec 16: More targeted outreach to specific audiences
- Rec 17: Improve SCP process
- Rec 18: Use policy to review MPA restoration/mitigation efforts
- Rec 20: Increase enforcement capacity
- Rec 21: Enhance citation record keeping and management
- Rec 25: Implement MPA climate change research
- Rec 27: Improve understanding of MPA effects on fisheries

Mid-Term (2 – 5 years)

- Rec 2: Create pathway to tribal MPA management
- Rec 3: Build tribal capacity to participate in MPA management
- Rec 6: Include and fund more diverse researchers and stakeholders
- Rec 8: Evaluate MPA accessibility
- Rec 12: Improve understanding of human dimensions
- Rec 13: Explore innovative technologies
- Rec 14: Develop MPA community science strategy
- Rec 15: Evaluate Outreach needs and resource effectiveness
- Rec 22: Increase knowledge on MPA judicial outcomes
- Rec 23: Examine MPA Network design attribute more effectively
- Rec 26: Consider climate change in human dimensions monitoring
- Rec 28: Integrate influencing factors into MPA performance evaluations

Long-Term (5- 10 years)

- Rec 5: Establish targets to meet MLPA goals
- Rec 19: Create MPA Enforcement Plan
- Rec 24: Better incorporate marine cultural heritage into MPA Network

Questions

All CDFW Petition Evaluations available through the MPA Management Program Petition StoryMap, which can also be accessed via this QR code

CALIFORNIA MARINE PROTECTED AREAS

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

CALIFORNIA
OCEAN
PROTECTION
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Megan Rocha | Public Member

March 20, 2026

California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814
Transmitted via email: fgc@fgc.ca.gov

Re: Petitions to Adaptively Manage California's Marine Protected Area Network

Dear Chair Sklar, Vice Chair Anderson and Members of the Fish and Game Commission,

Thank you for your continued leadership and partnership to manage California's Marine Protected Area (MPA) Network. As environmental threats intensify across the world's oceans and coasts, our state's MPA Network stands out as a globally recognized model of ocean conservation.

The California Ocean Protection Council (OPC) submits this letter at the request of our Chair, Secretary Wade Crowfoot, to provide input on proposals to adaptively manage California's MPA Network. OPC is grateful for the ongoing collaboration with the Fish and Game Commission and the California Department of Fish and Wildlife (CDFW) to manage the MPA Network, and our input provided here is intended to complement CDFW staff's evaluation of MPA petitions. OPC staff will follow this letter with more specific input on submitted petitions prior to the Commission's regional public meetings.

OPC's Role in the MPA Network

OPC has a unique role in the management of our MPA network that leads us to provide input on its adaptive management. OPC is statutorily responsible for the direction of MPA policy (SB 96, 2013) and in this role, we set strategic priorities for the Network, lead coordinated implementation of the State's MPA Management Program, and convene the MPA Statewide Leadership Team, an advisory body of state and federal agencies, tribal representatives, and implementation partners, to coordinate MPA management activities across the state. OPC also directs funding to manage the Network through research, monitoring, enforcement, outreach, and restoration activities, with over $110 million in state investment since 2007.

OPC's 2026-2030 Strategic Plan includes four primary goals to protect ocean health and coastal communities through the end of this decade: build resilience to climate change; maximize community benefits and stewardship; safeguard coastal and marine biodiversity; and enable a sustainable blue economy that protects ocean health.

OPC's Strategic Plan includes the explicit objective of strengthening the performance and durability of California's MPA Network. To achieve this objective, OPC staff has been directed to develop science-based recommendations to support ongoing adaptive management of the MPA Network, develop pathways for collaborative stewardship and co-management of MPAs with California Native American tribes, establish clear MPA performance targets, develop an updated MPA Monitoring Action Plan to evaluate progress toward those targets, and fund long-term monitoring of the Network.

The Strategic Plan also directs several broader actions relevant to the MPA Network: building ecosystem resilience to climate change, conserving and restoring vulnerable habitats, and supporting thriving fishing communities and climate-resilient fisheries, among other efforts.

Adaptive Management of the MPA Network

OPC views the MPA Network as California's most important marine ecosystem conservation tool, and the Network has served as a model for marine biodiversity conservation around the world. It is the only network of protected areas in the world recognized on the International Union for Conservation of Nature (IUCN) Green List of Protected and Conserved Areas. This global designation recognizes the science-based, ecologically connected and community-driven design of the Network, the state's demonstrated history of ongoing adaptive management through our comprehensive MPA Management Program, and the ecological and social benefits of the Network shown in the Decadal Management Review.

California's MPA Network also serves as a foundation to achieve the state's 30x30 law, which requires state agencies to conserve 30 percent of California's lands and coastal waters by 2030. Our State Legislature and Governor through this law have directed us on a pathway to conserve more of our state waters this decade. Marine protected areas, which cover 16.2% of state waters, achieve more than half of this legally required conservation. While adaptively managing the MPA Network through the Commission and CDFW's process is one strategy in meeting the state's 30x30 goals, it is important to emphasize that MPAs are not the only strategy to achieve this conservation target. OPC has identified additional conservation approaches to achieve 30x30 outside of the MPA Network, including supporting tribally-led conservation, such as the Chumash National Marine Sanctuary established in 2024, strengthening biodiversity protections within National Marine Sanctuaries and exploring the role of other area-based coastal and marine designations in conserving biodiversity.

The Decadal Management Review, which assessed the effectiveness of the MPA Network, clearly showed that our MPA Network is improving ocean health. This is due in large part to the fully protected, no-take State Marine Reserves that form the ecological backbone of the Network. However, the Decadal Review did not specifically explore how to strengthen the MPA Network. OPC

believes considering current petitions with this question in mind is important to adaptively manage the Network. Given OPC's explicit objective to strengthen the performance and durability of the Network into the future, our input will address whether petitions hold promise to achieve this objective.

Given OPC's commitment to strengthening the performance of the MPA Network, our staff is generally concerned about any proposals that remove existing protections within the current MPA Network. While specific petitions that recommend such changes must be addressed on a case-by-case basis, it is important to maintain the strength of the existing Network, which leaves over 90% of state waters open for fishing, with 84% of state waters having no MPA-related restrictions on fishing.

MPA Conservation Amidst Climate Change and other Environmental Challenges

Climate change is already affecting marine life and habitats, with impacts expected to increase over time. The catastrophic collapse of kelp forest ecosystems off California's North Coast is just one example of how climate change can cause, accelerate or compound other stressors facing California's coast and ocean. Climate impacts also often have cascading effects, not just for ecosystems but for coastal economies and communities that rely on a healthy ocean.

MPAs are a tool to protect full ecosystems, and although the role of MPAs in supporting climate resilience is the subject of ongoing scientific study, species and habitats inside MPAs across the globe have been shown to better withstand and rebound from climate-driven impacts than unprotected areas. Scientific evidence suggests that the protections provided by MPAs – such as maintaining genetic diversity, keeping food webs intact, and supporting large population sizes – can help buffer climate impacts and help serve as an "insurance policy" against future uncertainty. MPAs can also help mitigate climate change by protecting habitats that sequester carbon, such as wetlands and seagrass meadows.

California's MPA Network likely already provides important climate resilience benefits by functioning as an ecologically connected statewide network and protecting multiple types of habitats. However, adaptive management represents a critical opportunity to bolster these benefits, for example by ensuring that vulnerable ecosystems are adequately represented in the Network, or by identifying and protecting areas that will become new safe havens as species move northward with warming water.

Prioritizing Tribal Stewardship and Co-Management

California Native American tribes have stewarded the lands and waters of what is now known as California since time immemorial. Revitalizing tribally-led conservation and protecting places with biocultural significance, which reflects the fundamental interconnectedness of people and place, is a key priority for the Newsom Administration and is critical to healing past harms and protecting and restoring nature.

OPC's 2026-2030 Strategic Plan and the recommendations in the Decadal Management Review highlight tribal MPA co-governance and co-management as a top priority for the state. Creating a clear path to tribal co-governance, co-management, and collaborative stewardship of MPAs – whether that is focused on existing MPAs or new MPAs proposed by tribes – can help reconnect tribes to their ancestral waters, cultural lifeways, and traditional stewardship practices, ultimately supporting improved tribal community well-being as well as providing strong benefits for biodiversity. OPC is highly supportive of adaptive management actions that advance co-governance, co-management, and collaborative stewardship with tribes.

Support Thriving Fishing Communities and Climate-Resilient Fisheries

OPC recognizes the critical importance of enabling a sustainable blue economy that protects ocean health, of which fishermen and fishing communities are central. Myriad environmental stressors have diminished health of our fisheries over the last decade: extreme events such as extended droughts; changing ocean conditions that generate new threats such as expanded domoic acid outbreaks; marine ecosystem breakdown including collapse of kelp forest ecosystems; pollution into our coastal waters; and impaired river health through excessive historic diversions.

Our MPA Network is one important response to protect and restore the health of our fisheries over the long term to weather these changes, given clear evidence that protected areas generate healthier ecosystems that provide the basis of sustainable, abundant fisheries into the future. It should be noted that the sum total of current petitions before the Commission to strengthen the Network covers only 2.1% of coastal waters. If all petitions were adopted, 83% of state waters would remain open to fishing.

OPC believes a strong, resilient MPA network is essential both for the environmental health of our ocean and the future abundance of our fisheries. We also deeply value the fishermen and fishing communities that help support California's booming coastal economy and are critical partners in our efforts to understand ecosystem shifts and safeguard marine life and habitats. OPC will continue to prioritize collaboration and investments that help fishermen and fishing communities adapt and thrive as climate-driven impacts accelerate the need for flexible and innovation solutions. This includes investments that reduce entanglement in fishing gear to protect whales while keeping fishermen on the water, promote California wild-caught seafood, improve waterfront infrastructure, and advance planning that supports community sustainability and resilience.

Input on Specific Petitions

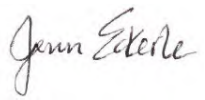
In coming weeks, OPC plans to provide specific input on existing petitions through our MPA policy lens articulated in this letter. We believe this can complement the rigorous assessment that CDFW staff completed of petitions under a separate set of questions and criteria established by the Commission. We will provide this input and recommendations in advance of the Commission's public meetings on these petitions.

We recognize and appreciate that CDFW's evaluation recommendations are based on petition amendments that were received by the March 2025 deadline. CDFW staff quite reasonably needed to establish a deadline after which new proposed revisions to the petitions could not be assessed in their evaluation. We also understand that many petitioners have been working for months to revise their petitions to be responsive to community feedback and concerns. OPC's policy recommendations will be based on the petitions as currently amended.

Lastly, we are deeply appreciative of all the Commission is doing to provide a clear, accessible venue to collect the full range of perspectives on these MPA petitions. We value and respect this diversity of perspectives and are committed to finding creative solutions that reflect the range of tribal, conservation and fishing priorities in the state, with a shared goal of ensuring a healthy and thriving ocean for all Californians, now and into the future.

Please do not hesitate to reach out to me with questions or to discuss our shared efforts.

Sincerely,



Jenn Eckerle
Executive Director

cc:
Melissa Miller-Henson, FGC Executive Director
Susan Ashcraft, FGC Marine Advisor
Meghan Hertel, CDFW Director
Craig Shuman, CDFW Marine Region Manager

CALIFORNIA
OCEAN
PROTECTION
COUNCIL

July 31, 2026

California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814
Transmitted via email: fgc@fgc.ca.gov

Re: OPC Staff Recommendations - Petitions to Adaptively Manage California's Marine Protected Area Network

Dear President Sklar, Vice President Anderson, and Members of the California Fish and Game Commission,

Thank you for your leadership in managing California's Marine Protected Area (MPA) Network – the global gold standard for marine conservation. Building on our public letter transmitted to the California Fish and Game Commission (CFGC) on March 20[1], which outlined the role of the California Ocean Protection Council (OPC) in MPA management and highlighted major OPC policy priorities for MPAs, we are pleased to provide specific input and OPC staff's recommendations on submitted petitions for changes to the MPA Network currently under consideration by CFGC. As noted in our March 20 letter, this input is intended to complement the comprehensive evaluations of MPA petitions conducted by the California Department of Fish and Wildlife (CDFW) under a separate set of questions and criteria established by CFGC.

The first-ever Decadal Management Review of the MPA Network, released in 2023, clearly demonstrated that MPAs are working to improve California's ocean health. However, the Decadal Management Review did not specifically explore opportunities to strengthen the existing MPA Network. As noted in our March 20 letter, OPC believes that evaluating MPA petitions with this question in mind is essential for ensuring the continued success of California's MPAs, especially as a changing climate increasingly threatens coastal and marine

1 https://opc.ca.gov/wp-content/uploads/2026/03/OPC-letter-on-MPA-petitions_3.20.26-508.pdf

ecosystems and ecosystem services. Therefore, this input provided by OPC staff is explicitly focused on whether proposed actions hold promise to strengthen the performance and durability of the MPA Network. This is consistent with OPC's Strategic Plan[2] and key recommendations from the Decadal Management Review[3].

Overall, **OPC's petition recommendations are rooted in a precautionary approach.** The 2026 California Coast and Ocean Report[4], released earlier this year, indicates that climate change is increasingly threatening coastal and marine ecosystems, as well as benefits provided by those ecosystems to coastal communities and California Native American tribes. In the face of warming oceans, sea level rise, the devastation of our state's kelp forests, severe shocks to fishing communities, and other climate-driven impacts, California's MPA Network is one of our most effective conservation tools for safeguarding biodiversity, building climate resilience, and ensuring the continued delivery of important ecosystem services that drive our state's multi-billion dollar ocean economy.

It is through this lens that we assessed petitions. Specifically, we looked for opportunities to bolster the types of MPA benefits anticipated to serve as an "insurance policy" against changing ocean conditions, such as increased population sizes, higher genetic diversity, strengthened ecological connectivity, and intact food webs. In doing so, we acknowledge that the effects of climate change are uncertain and that MPAs are not a panacea for the threats facing our ocean. We strongly support continued research and monitoring to assess the impacts of climate change on coastal and marine ecosystems and how MPAs may mitigate these impacts. In particular, California's robust MPA monitoring program, which is actively tracking the effects of MPAs across key ecosystems and coastal communities statewide, will continue to be a crucial tool in evaluating the overall success of the Network and any adaptive management changes made through the petition process. OPC is committed to continuing our support for the development and application of best available science to adaptively manage the Network into the future.

Given this precautionary approach, **we do not recommend that CFGC approve any petition that would weaken the existing MPA Network** (Petitions 2023-14MPA, 2023-15MPA_AM, 2023-

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2 OPC 2026-2030 Strategic Plan Objective 3.1: Strengthen the performance and durability of California's Marine Protected Area Network.

3 Decadal Management Review recommendations #4 (Apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network and Management Program); #23 (Expand and target monitoring and research efforts to examine the design attributes of the MPA Network more effectively); #28 (Further integrate influencing factors into ecological and human study designs and interpretations of MPA performance).

4 https://opc.ca.gov/wp-content/uploads/2026/03/California-Coast-and-Ocean-Report-2026.pdf

16MPA, 2023-18MPA[5], and 2023-23MPA_AM[6]**.** These petitions include several proposed actions that would open no-take State Marine Reserves or limited-take State Marine Conservation Areas to certain new types of fishing. OPC appreciates the thoughtfulness of petitioners in developing these proposals; however, we find that any actions that would roll back existing protections pose an unacceptable risk to the integrity of the existing Network. Such actions, while well-intentioned, have the potential to compromise existing conservation benefits and degrade the ability of the Network to meet the goals of the Marine Life Protection Act.

As a first step in assessing petitions with potential to strengthen the MPA Network (i.e. proposals for new MPAs, expanded MPAs, or stricter regulations), OPC staff first considered **whether petitions would improve MPA Network design**. Importantly, neither the Decadal Management Review nor CDFW's recently released Science Guide to California's MPA Network[7] identify significant design deficiencies in the MPA Network. Indeed, the Network is largely compliant with science guidance from the MPA planning process, with most MPAs meeting minimum size guidelines and all MPAs meeting minimum spacing guidelines. However, from a precautionary standpoint, some petitions have clear potential to improve MPA Network design, for example by reducing large distances between MPAs or increasing the representation of vulnerable habitats within the Network. OPC finds clear Network design benefits for three petitions: Petition 2023-29MPA_AM2, Petition 2023-32MPA, and two actions within Petition 2023-33MPA_AM1.

As a next step, OPC considered **whether petitions would result in meaningful additional biodiversity protection beyond what the current MPA Network already provides**. This could include actions such as: bolstering protections for important geological or biological features; protecting additional sensitive habitat, such as eelgrass, kelp forests, or rocky shores; protecting ecosystems that are important larval sources, sinks, or retention zones; strengthening ecological

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5 Petition 2023-18MPA includes an action that would open Vandenberg State Marine Reserve to certain types of shore fishing. A petition submitted in 2022 by the City of Lompoc (Petition 2022-04) proposes a similar action and will be considered by CFGC alongside the other petitions discussed here. While we recognize that Petition 2022-04 is intended to improve equitable coastal access for local residents, it would weaken protections provided by Vandenberg State Marine Reserve, which serves as a critical backbone MPA in the region. We recommend that CFGC deny Petition 2022-04.

6 One action in 2023-23MPA_AM (Action 20) has potential to strengthen the MPA Network: designation of a new MPA at Tanker's Reef. However, as proposed, this new MPA falls far below the minimum area required to function as a replicate in the MPA Network and is unlikely to provide meaningful additional conservation benefits beyond those already achieved by the existing Network, especially in the highly protected Monterey Bay region.

7 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=246940&inline

connectivity; reducing fishing pressure on populations in decline; promoting improved ecosystem structure and function; or enhancing the resilience of the MPA Network to current or predicted climate impacts. Importantly, in exploring this consideration, OPC gave equal weight to petitions that would address current specific threats to biodiversity, such as the impacts of fishing gear on sensitive habitats, and petitions that would improve the Network's ability to withstand larger-scale and more diffuse impacts, such as marine heat waves. OPC finds compelling biodiversity benefits for several petitions: Petition 2023-21MPA_AM1, Petition 2023-27MPA_AM1, Petition 2023-28MPA_AM1, Petition 2023-29MPA_AM2, Petition 2023-32MPA, and two actions within Petition 2023-33MPA_AM1.

Finally, OPC considered **whether petitions would help support and revitalize tribally-led stewardship**. OPC is highly supportive of MPA adaptive management actions that advance co-governance, co-management, and collaborative stewardship with tribes. Such actions, which include protecting places with high biocultural significance, are essential not only for righting historical wrongs, but also for reconnecting tribes to traditional stewardship practices that can directly benefit biodiversity. Increased support for tribal stewardship is a top priority in both OPC's 2026-2030 Strategic Plan[8] and the California Natural Resources Agency's recently released Tribal Stewardship Policy[9], which aims to expand tribal stewardship of at least 7.5 million acres of California's lands and coastal waters. OPC finds that the following petitions have strong potential to advance tribally-led stewardship: Petition 2023-20MPA_AM1, Petition 2023-21MPA_AM1, Petition 2023-28MPA_AM2, and Petition 2023-29MPA_AM2.

Based on these considerations, OPC recommends approval of the following petitions, with some modifications. In developing these recommendations, OPC staff evaluated the most recent versions of petitions, including any amendments or clarifications received from petitioners after CFGC's March 2025 deadline for petition amendments.

8 OPC 2026-2030 Strategic Plan Objective 2.1: Strengthen partnerships with California Native American tribes.

9 https://resources.ca.gov/Initiatives/Tribalaffairs/TribalStewardshipPolicyAndToolkit

Table 1. OPC's recommended petitions.

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-20MPA_AM 1 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Point Buchon SMCA and Point Buchon SMR (existing)	Santa Ynez Band of Chumash Indians	Add a tribal take exemption at Point Buchon SMCA, rename Point Buchon SMCA, and adjust northern boundary of Point Buchon SMR	Approve tribal take exemption and renaming; deny proposed boundary change
2023-21MPA_AM1 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Pyramid Point SMCA (existing)	Tolowa Dee-ni' Nation	Remove recreational take of true smelt in Pyramid Point SMCA and adjust northern boundary of Pyramid Point SMCA	Approve proposed removal of recreational take of true smelt; deny proposed boundary change
2023-27MPA_AM1 (as clarified at the May 6, 2026 CFGC regional meeting)	Anacapa Island SMCA (existing)	Environmental Defense Center	Modify regulations at Anacapa Island SMCA to protect sensitive eelgrass habitats (with several options proposed)	Modify SMCA regulations to prohibit the deployment of lobster traps shallower than 50 feet
2023-28MPA_AM2 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Point Sal SMCA (new)	Northern Chumash Tribal Council and Natural Resources Defense Council	Add a new MPA near Point Sal	Approve the proposed new Point Sal SMCA

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-29MPA_AM2 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Mishopshno SMCA (new)	Santa Ynez Band of Chumash Indians and Natural Resources Defense Council	Add a new MPA near Carpinteria	Approve the proposed new Mishopshno SMCA
2023-32MPA (as clarified at the April 21, 2026 CFGC regional meeting)	Duxbury Reef SMCA (existing)	Environmental Action Committee of West Marin	Expand Duxbury Reef SMCA and modify regulations to strengthen protections for intertidal species	Designate two new SMCAs to protect the northern and southern portions of Duxbury Reef, each with take regulations that protect intertidal seaweed and invertebrates while allowing for continuation of other existing shore- and boat-based fishing
2023-33MPA_AM1	Various existing MPAs and one proposed new MPA	Environment California and Azul	Expand six existing MPAs statewide and add a new MPA in Santa Cruz	Approve proposed expansion of Point Dume SMCA, but deny proposed additional take allowance in Point Dume SMCA. Approve a smaller expansion of Point Conception SMR. Deny proposed expansion of Natural Bridges SMR, Cabrillo SMR, South Point SMR, or Gull Island SMR. Deny proposed designation of a new SMCA at Pleasure Point.

Detailed narratives providing justification for these recommendations are provided in the "Recommendation Narratives" section below, starting on page 10.

We recognize that our recommendations do not include three petitions intended to strengthen the MPA Network: Petition 2023-19MPA, Petition 2023-24MPA and Petition 2023-34MPA.

- Petition 2023-19MPA, submitted by the Santa Ynez Band of Chumash Indians, would designate a new SMCA, to be named Chitqawi in honor of a nearby Chumash coastal

village, offshore and to the north of Morro Bay in San Luis Obispo County. The proposed Chitqawi SMCA would protect waters adjacent to Morro Rock. However, the proposed SMCA would be located immediately adjacent to Morro Bay Harbor, a critical regional port, potentially presenting significant challenges. OPC also recognizes that many California Native American tribes, including non-federally recognized tribes, have significant cultural ties to Morro Rock. Given that the original petition focused on co-management of the area as its main goal, OPC recommends that CFGC work with the Santa Ynez Band of Chumash Indians to identify alternative pathways for strengthening protection of Morro Rock and establishing meaningful co-management agreements here and in the broader region. The petition process may have been an irregular fit for the Tribe's goals with this petition and OPC is committed to working with the Tribe going forward to protect this area through meaningful co-management.

- Petition 2023-24MPA, submitted by the Laguna Bluebelt Coalition, would extend the southern boundary of the Laguna Beach No-Take SMCA into the northern portion of Dana Point SMCA, expanding the No-Take SMCA and aligning its southern boundary with the southern border of the City of Laguna Beach. While this would increase overall protection in the area and potentially benefit fished species (e.g. finfish, lobster, and urchin) within the Dana Point SMCA, OPC notes that the existing boundary of the Laguna Beach No-Take SMCA currently aligns with both a clear latitude line as well as prominent rocky outcroppings, which serve as a helpful landmark for both boat-based and shore-based anglers. Changing this well-established and clear boundary has the potential to result in increased confusion and potential enforcement challenges.

- Petition 2023-34MPA, submitted by Environment California and Azul, would reclassify Point Buchon SMCA to an SMR and strengthen protections in Farnsworth Onshore and Offshore SMCAs by removing all take except for recreational spearfishing. Petitioners argue that these changes are necessary to address issues regarding compliance with MPA regulations; however, neither Point Buchon SMCA nor Farnsworth Onshore or Offshore SMCAs appear to have an unusually high number of MPA-related citations and, in fact, citation data demonstrate an overall trend of improved compliance with MPA regulations at Point Buchon SMCA.

For reference, our recommendations on each of the fifteen MPA petitions currently under consideration by CFGC are summarized in the "Recommendations At-a-Glance" table below, starting on page 28.

In closing, OPC appreciates the robust conversation around MPA petitions to date and recognizes that the many Californians who have engaged in this process hold a diversity of

perspectives, interests, and viewpoints related to these petitions. OPC staff attended all three in-person regional meetings of CFGC held earlier this year, which were intended to provide a venue for public feedback on petitions. At those meetings, we heard tribal members, conservation advocates, and students voice strong and passionate support for a strengthened MPA Network that can help protect our vulnerable coast and ocean in a time of rapid environmental change. However, we were also compelled by the serious concerns of many members of local communities, including commercial and recreational fishermen, whose lives and livelihoods have the potential to be significantly impacted by new or expanded MPAs. We deeply value California's commercial and recreational fishing communities and recognize their critical role in supporting a thriving blue economy. To that end, where possible, we have endeavored to provide creative recommendations on petitions that add conservation value to the existing MPA Network while limiting impacts to commercial and recreational fishing. More broadly, as highlighted in Goal 4 of our 2026-2023 Strategic Plan, OPC is committed to advancing a sustainable blue economy by investing in healthy marine ecosystems and resilient coastal communities that can continue to support fishing livelihoods for generations to come.

Additionally, the regional meetings made it abundantly clear that many communities, especially communities entitled to environmental justice, can face significant systemic barriers to accessing the coast and ocean and to participating in MPA management and decision-making processes. Millions of Californians visit the coast each year to access the ocean in different ways, including to engage in both consumptive and non-consumptive uses. Because of this, assessing benefits related to equitable access for individual petitions is a complex undertaking. Impacts of individual petitions on equitable access[10] and on advancing CFGC's Justice, Equity, Diversity, and Inclusion Policy[11] have been initially assessed via a joint effort between OPC and CDFW [12]; OPC is committed to expanding equitable access to the coast and ocean and supporting improved inclusion in coastal and ocean management, consistent with the goal of OPC's 2026-2030 Strategic Plan to maximize community benefits and stewardship, as well as OPC's Equity Plan[13].

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10 Specifically Question 14 in CDFW's Evaluation Framework: Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?

11 Specifically Question 16 in CDFW's Evaluation Framework: Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy (https://fgc.ca.gov/About/JEDI)?

12 Available here: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=246997&inline

13 https://www.opc.ca.gov/webmaster/_media_library/2022/11/OPC-Equity-Plan-508.pdf

Thank you for considering our recommendations. We look forward to the work ahead and to continued meaningful engagement with California's diverse coastal communities as the petition process unfolds.

Sincerely,



Jenn Eckerle
Deputy Secretary for Oceans and Coastal Policy, California Natural Resources Agency
Executive Director, Ocean Protection Council

Recommendation Narratives

Petition 2023-20MPA_AM1: Add a tribal take exemption at Point Buchon SMCA, rename Point Buchon SMCA, and change northern boundary of Point Buchon SMR

The Santa Ynez Band of Chumash Indians (SYBCI) has proposed several changes to Point Buchon SMCA[14] and Point Buchon SMR[15]. As amended by the tribe at the April 14, 2026 meeting of CFGC's Tribal Committee[16], these proposed changes are: add a tribal take exemption at Point Buchon SMCA for the Santa Ynez Band of Chumash Indians, rename Point Buchon SMCA, and change the northern boundary of Point Buchon SMR. Located approximately eight miles south of Morro Bay in San Luis Obispo County, Point Buchon SMCA and Point Buchon SMR together protect nearly 19 square miles of rocky reefs, sandy seafloor, beaches, kelp forests, rocky intertidal habitat, offshore pinnacles, and some of the shallowest cold-water corals in California (SeaSketch California 2026). Point Buchon SMR spans approximately 2.5 miles of coastline between Coon Creek and Diablo Canyon and protects 6.7 square miles of coastal waters between shore and approximately 200 feet deep (SeaSketch California 2026). Point Buchon SMCA protects more than 12 square miles of coastal waters offshore of the SMR, ranging from approximately 200 to 400 feet deep (SeaSketch California 2026).

Adding a tribal take exemption to Point Buchon SMCA and renaming Point Buchon SMCA to better reflect Chumash cultural heritage both represent significant opportunities to advance tribal sovereignty, collaborative governance, and tribal stewardship within the Central Coast[17] bioregion of the MPA Network. Similar to other tribal take exemptions currently granted to SYBCI for MPAs in the South Coast bioregion of the MPA Network, such as Kashtayit SMCA, the proposed tribal take exemption for Point Buchon SMCA would exempt SYBCI members from MPA-specific take restrictions and thus allow SYBCI members to harvest living marine resources

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14 SMCA = State Marine Conservation Area. In this type of MPA, certain recreational or commercial fishing activities may be allowed, while other types of take are prohibited. https://wildlife.ca.gov/Conservation/Marine/MPAs/Definitions#mpa

15 SMR = State Marine Reserve. In this type of MPA, all take is prohibited. https://wildlife.ca.gov/Conservation/Marine/MPAs/Definitions#mpa

16 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=245526&inline

17 As defined in the 2018 MPA Monitoring Action Plan (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161748&inline), the bioregions of the MPA Network are: North Coast (California/Oregon border to San Francisco Bay, including the Farallon Islands), Central Coast (San Francisco Bay to Point Conception), and South Coast (Point Conception to U.S./Mexico border, including the Channel Islands).

for cultural, subsistence, and stewardship purposes. Regulations in the adjacent Point Buchon SMR would remain unchanged.

Point Buchon is also culturally significant. The petition identifies Buchon as a historical Chumash village site and describes the area as having special spiritual significance to Chumash maritime peoples. Establishing a tribal take exemption at Point Buchon SMCA and renaming the SMCA would recognize this significance and advance progress toward tribal co-management of this MPA, which the tribe has requested to pursue through a non-regulatory pathway. **OPC recommends that CFGC approve the proposed tribal take exemption and name change for Point Buchon SMCA.**

Petitioners have also requested to adjust Point Buchon SMR's northern boundary further to the north, arguing that doing so would better capture the full marine area offshore of Point Buchon. However, OPC notes that the existing northern boundary aligns with a readily determinable line of latitude (35° 15.250' N) and prominent onshore landmarks; changing the boundary could cause confusion and enforcement challenges and would also result in a misalignment of the northern boundaries of Point Buchon SMR and SMCA. **OPC recommends that CFGC deny the requested boundary adjustment for Point Buchon SMR.**

Petition 2023-21MPA_AM1: Remove recreational take of true smelt in Pyramid Point SMCA and adjust northern boundary of Pyramid Point SMCA

The Tolowa Dee-ni' Nation has proposed two changes to Pyramid Point SMCA, located at Pyramid Point in Del Norte County near the California-Oregon border: removal of the current recreational take allowance for true smelt, and adjustment of the SMCA's northern boundary. Pyramid Point SMCA is the northernmost MPA in California's MPA Network and covers approximately 14 square miles of sandy beaches, offshore rocks, and soft seafloor; currently the only type of take allowed in this MPA is recreational take of surf smelt (*Hypomesus pretiosus*, known as *lhvmsr* in the Tolowa language)[18] by dip net or Hawaiian-type throw net, as well as tribal take of all species, consistent with applicable state fishing regulations, by the Tolowa Dee-ni' Nation through a tribal take exemption. The proposal is intended to protect a culturally and ecologically important forage fish species while maintaining tribal take of that species,

18 Technically, Pyramid Point SMCA allows take of a three-species "true smelt" group: surf smelt, night smelt, and whitebait smelt. To achieve the requested removal of the recreational take allowance for surf smelt, it is necessary to remove the recreational take allowance for the species group. At the April 14, 2026 meeting of CFGC's Tribal Committee, the Tolowa Dee-ni' Nation amended this petition to change its request from removal of the take allowance for surf smelt to removal of the take allowance for true smelt.
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=245526&inline

particularly take associated with traditional Tolowa Dee-ni' Nation "fish camps" – annual events where members of the Nation travel to the coast to fish, camp, and traditionally process surf smelt during its spawning months from July to October.

Petitioners argue that removal of the existing recreational take allowance is needed because, according to the Tolowa Dee-ni' Nation's Traditional Knowledges – particularly the observations of traditional surf smelt fishermen – surf smelt populations have declined substantially since the late 1990s. OPC respects and affirms the importance of tribal science and Traditional Knowledges and also notes that this trend has been documented through non-indigenous science. Though no formal stock assessments have been completed for surf smelt, CDFW's 2020 Enhanced Status Report for the species shows that commercial landings statewide (95% of which occur in Humboldt and Del Norte County ports) regularly exceeded 500,000 pounds per year in the mid-1990s but dropped precipitously in 1998-1999 and have not exceeded 250,000 pounds per year in the last twenty years (CDFW 2020). Commercial surf smelt landings declined to record lows of approximately 700-1,000 pounds annually between 2017 and 2019 before showing a modest rebound beginning in 2020, although catches remained well below historical levels (CDFW 2025). California Recreational Fisheries Surveys (CRFS) data summarized in CDFW's Enhanced Status Report that recreational surf smelt landings were negligible from 2005 through 2017, apart from an anomalous spike to approximately 110,000 pounds in 2011; the CRFS program that produced these estimates was discontinued in 2018 (CDFW 2020, CDFW 2025).

The decline of surf smelt populations concerns OPC for several reasons. First, forage fishes such as surf smelt play critical roles in nearshore food webs because they transfer energy from plankton-rich coastal waters to higher trophic levels, supporting fish, seabird, and marine mammal populations (Pikitch et al. 2014, Essington et al. 2015). Surf smelt in particular play a foundational role in Northern California coastal ecosystems by serving as prey for species such as salmon, seabirds, marine mammals, and other predators. As an important forage fish, their abundance can reflect broader ecosystem condition and food web dynamics (Santora et al. 2021, NOAA Fisheries 2022). Second, Native American tribes on California's North Coast have relied on surf smelt since time immemorial for subsistence and cultural heritage. As described in the petition, Tolowa families return to the coast each year for "fish camps" that involve the harvest of surf smelt using traditional A-frame nets, with associated prayers, protocols, and ceremonies. Maintaining access to a healthy surf smelt population is essential to the continuation of tribes' cultural practice, food sovereignty, spiritual relationships, and community well-being (Turner et al. 2008, Charles & Wilson 2009).

Surf smelt are a sensitive species and their population trends can be heavily influenced by a number of factors. This includes not only fishing pressure – heavy fishing can cause surf smelt populations to decline quickly given their short life cycles and the fact that most fishing occurs

during spawning – but also environmental stressors, including warming waters, pollution, and physical impacts to beaches where they spawn (Russell et al. 2022, Tomlin et al. 2021). OPC recognizes that MPAs have limited ability to mitigate these larger-scale threats. However, given the population declines noted above and the ecological and cultural importance of surf smelt, OPC supports stricter MPA regulations to strengthen protections for this vulnerable species. OPC notes that approval of this petition would allow continued tribal harvest of surf smelt, but this traditional take is unlikely to have population-level impacts.

To support the recovery of surf smelt, the integrity of nearshore food webs, and the continuation of tribal stewardship and cultural use of this species into the future, **OPC recommends that CFGC approve removal of the allowance for recreational take of true smelt in Pyramid Point SMCA**. The Tolowa Dee-ni' Nation would retain its existing tribal take exemption for this SMCA.

Petitioners have also requested a boundary adjustment to align the northern boundary of Pyramid Point SMCA with the terrestrial California-Oregon border. California's terrestrial northern boundary was intended to run along the 42° N latitude line, but initial surveys with primitive equipment in 1868 resulted in a zigzag border that deviates up to a half mile north or south of that latitude line. In contrast, the offshore northern boundary is an arc that projects seaward from the 42° N latitude line and connects the outermost headlands of the mainland coast to offshore rocks. For this reason, California's offshore and terrestrial borders are slightly misaligned; the offshore boundary is consistent with California's legally recognized northern border at 42° N latitude and is used in all ocean-based regulations. Changing the northern boundary of Pyramid Point SMCA so that it no longer aligns with this recognized offshore boundary would likely result in regulatory confusion and enforcement challenges. **OPC recommends that CFGC deny the request to modify Pyramid Point SMCA's northern boundary.**

Petition 2023-27MPA_AM1: Modify regulations at Anacapa Island SMCA to protect sensitive eelgrass habitats

Environmental Defense Center has submitted a petition with three options intended to better protect sensitive eelgrass meadows inside the Anacapa Island SMCA from the impacts of lobster traps and other hard-bottomed fishing gear. As clarified by the petitioner at the May 6, 2026 CFGC regional meeting[19], the proposed options are 1) Change regulations to disallow commercial lobster fishing year-round within the Anacapa Island SMCA; 2) Change regulations

19 Video available at https://cal-span.org/meeting/cfg_20260506/. Discussion of Petition 2023-27MPA_AM1 begins at 01:05:13.

to disallow hard bottomed fishing gear (including anchoring if applicable) near eelgrass meadows within the Anacapa Island SMCA, or 3) Change the border of the Anacapa Island Special Closure to prohibit the deployment of lobster traps from 0-50 feet deep, instead of the existing 0-20 feet deep.

Pacific eelgrass (*Zostera pacifica*) is a foundational species that is found along California's open coast and provides vital habitat, food, and shelter for a variety of marine fishes and invertebrates. Eelgrass also supports sediment stabilization and erosion protection, plays an important role in nutrient cycling, and helps mitigate climate change by sequestering carbon (Waycott et al. 2009, Fourqurean et al. 2012, Duarte et al. 2013). Eelgrass beds are inherently dynamic and naturally fluctuate from year to year; eelgrass persistence is influenced by a variety of environmental factors including temperature, currents, sediment dynamics, water quality, and availability of suitable substrate (Grech et al. 2012, Rock & Daru 2021, Zabarte-Maeztu et al. 2021, Herrera et al. 2022). At the same time, numerous studies have demonstrated that hard-bottomed fishing gear, including traps and pots, can negatively impact eelgrass (Stevens 2021, Rees et al. 2021). Traps can crush eelgrass shoots and rhizomes upon impact, and they may smother eelgrass if left in place. The setting and retrieval of traps, dragging of trap lines, and movement of traps while in the water often leaves bare scouring marks or "haloes" of damage in eelgrass meadows (Abadie et al. 2016, Stevens 2021, Rees et al. 2021).

Eelgrass meadows were once abundant along the north sides of all three islets that make up Anacapa Island, generally found from approximately 0-20 feet deep but sometimes extending to 45 feet deep (Altstatt 2021). Although eelgrass virtually disappeared around Anacapa Island during the late 1980s following the 1982-1983 El Niño and subsequent overgrazing by white sea urchins, it has recovered in many places thanks in part to a successful eelgrass restoration effort initiated in 2002 at Frenchy's Cove on the north side of West Anacapa Island (Altstatt et al. 2014).

Frenchy's Cove is situated within both the island-wide nearshore Anacapa Island Special Closure, which prohibits the use of nets and traps from 0-20 feet deep, as well as the much larger Anacapa Island SMCA, which extends to the three nautical mile state water boundary and prohibits most forms of take except for recreational take of lobster and pelagic finfish, as well as commercial take of lobster. Offshore of Frenchy's Cove, a Brown Pelican Fledgling Area – an extension of the Special Closure across approximately 4,000 feet of coastline – prohibits all boating activity and access from 0-120 feet deep from January 1 - October 31. Together, these regulations protect eelgrass meadows located in 0-20 feet of depth year-round, and meadows located deeper than 20 feet for 10 months out of the year.

These existing regulations already provide eelgrass meadows at Frenchy's Cove with substantial protection from fishing gear impacts. However, eelgrass meadows deeper than 20 feet at Frenchy's Cove are still vulnerable to fishing gear impacts for two months out of the year. Subtidal surveys conducted by the Channel Islands monitoring program show that these deeper meadows represent a substantial proportion of the eelgrass inside the Anacapa Island SMCA (SeaSketch California 2026) and, because eelgrass is a delicate ecosystem that can take years to recover from fragmentation or scarring (Altstatt et al., 2014; Reed & Hovel, 2006), damage accrued during the two months that the Brown Pelican Fledgling Area is open is likely to have lasting and outsized impacts on the integrity and function of these eelgrass meadows.

OPC recognizes that some data gaps exist regarding the distribution of eelgrass at Frenchy's Cove and Anacapa Island more broadly, as well as the drivers contributing to its persistence and loss. However, in the context of substantial declines of eelgrass statewide since the 1950s (Waycott et al. 2009, Harris et al. 2026), and the critical importance of eelgrass meadows for marine biodiversity (Kindeberg et al. 2022), OPC finds that regulatory action to protect the full extent of eelgrass meadows inside Anacapa Island SMCA, i.e. providing new protections for meadows that occur from 20-45 feet, is warranted. In assessing the petitioner's proposed options, OPC finds that Option 1 (prohibiting lobster fishing within the entire Anacapa Island SMCA, which extends three nautical miles offshore to a depth of nearly 500 feet) is unnecessary to protect eelgrass meadows, which are a nearshore ecosystem. Further, OPC notes that Option 2 (prohibiting lobster fishing "near eelgrass meadows") would be difficult to enforce given the inherently dynamic nature of these ecosystems. Finally, OPC is concerned that Option 3 (extending the boundary of the Anacapa Island Special Closure from 20 feet deep to 50 feet deep) could be problematic for multiple reasons: first, the specific intent of the Special Closure is to decrease entanglement risk for birds feeding near roosting grounds on the island; second, changing the boundary could add to existing significant regulatory confusion between the Anacapa Island SMCA, SMR, and Special Closure/Brown Pelican Fledgling Area; and third, this option would unnecessarily restrict lobster fishing opportunities outside of the Anacapa Island SMCA. Therefore, **OPC recommends that CFGC modify the regulations at Anacapa Island SMCA to prohibit the deployment of lobster traps shallower than 50 feet**. This simplified alternative pathway would strengthen protections for eelgrass meadows within their full depth range inside the SMCA, while maintaining lobster fishing opportunities outside the SMCA.

OPC also recognizes that non-consumptive activities, such as anchoring, may have similar impacts on eelgrass meadows as lobster trapping. OPC recommends exploration of non-regulatory management solutions, potentially including installation of moorings within the SMCA, to mitigate other activities that can damage the seafloor.

Petition 2023-28MPA_AM2: Add a new MPA near Point Sal (Point Sal SMCA)

The Northern Chumash Tribal Council and the Natural Resources Defense Council have proposed the designation of a new State Marine Conservation Area at Point Sal, California, situated at the northern end of Vandenberg Space Force Base near the City of Guadalupe in northern Santa Barbara County. As amended by petitioners at the April 14, 2026 meeting of CFGC's Tribal Committee[20], the proposed new Point Sal SMCA, which would eventually be given a name in a Chumash language to honor the importance of the area to local Chumash peoples, would span close to 7 miles of coastline and encompass nearly 15 square miles, from shore to a maximum depth of 187 feet (SeaSketch California 2026). It would prohibit all forms of take except for recreational take of finfish from shore using hook and line.

The proposed new Point Sal SMCA is located roughly 50 miles to the north of Point Conception, at the northern end of a major biogeographic transition zone within the California Current Large Marine Ecosystem, where warmer waters from the south meet colder, nutrient-rich waters from the north, supporting exceptionally high biodiversity (Hamilton et al. 2010, Blanchette et al. 2008, Arafeh-Dalmau et al. 2023). The waters offshore of Point Sal in particular are highly productive and nutrient-rich due to seasonal coastal upwelling in the area. This area supports abundant fish and invertebrate populations and serve as critical foraging grounds for seabirds and marine mammals – including multiple iconic California species such as brown pelicans, southern sea otters, and humpback whales (Checkley & Barth 2009).

The proposed new SMCA would protect a large portion of Point Sal's coastline and offshore waters, including sandy beach, rocky shoreline, shallow hard bottom, shallow soft bottom, and deep soft bottom habitats (SeaSketch California 2026). The new SMCA would also include a known krill hotspot that supports feeding blue whales from late spring to early fall (Santora et al. 2011, Savoca et al. 2021). Importantly, as noted by the petitioner, the area inside the proposed SMCA leeward of Point Sal may also function as a larval retention zone. Headlands and coastal promontories like Point Sal can slow or recirculate ocean currents, allowing fish and invertebrate larvae to remain near suitable settlement habitats rather than being transported offshore during upwelling events (Mace & Morgan 2006, Morgan et al. 2011, Harvey et al. 2021, Robinette et al. 2019). Robinette et al. (2019) found that seabird foraging rates, which can be used as an indicator of juvenile fish abundance, are generally higher in the lee of headlands and along south-facing coasts such as Point Sal. This suggests that the proposed new MPA has the

20 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=245526&inline

potential to protect an area of high juvenile fish recruitment, which could potentially add a rich new larval source "node" to the MPA Network.

The proposed Point Sal SMCA would also protect an area of substantial cultural importance to the Chumash people. There are long-standing Chumash connections to Point Sal, including archaeological evidence of occupation near the area dating back nearly 5,000 years. The Northern Chumash Tribal Council has stated that Point Sal is an especially sacred area within the broader Chumash Heritage National Marine Sanctuary, and designation of the proposed new Point Sal SMCA represents a unique opportunity to strengthen biodiversity protections within the Sanctuary.

Importantly, Point Sal is extremely remote. The public access road to Point Sal State Beach was washed out during severe storms during the 1998 El Niño event and was never repaired. Currently, access to Point Sal State Beach requires a round-trip hike of approximately 10 miles. Therefore, although the petitioners' proposed take allowance for hook-and-line fishing from shore would technically result in a moderate-low level of protection for Point Sal based on the science guidelines from the MPA planning process, OPC finds that the proposed new SMCA would likely still provide meaningful and significant biodiversity benefit given the difficulty associated with accessing Point Sal State Beach for shore-based fishing. Should existing conditions change in the future, we would support revisiting the take allowance for shore-based fishing.

Overall, OPC finds that the proposed new Point Sal SMCA represents an important opportunity to protect a pristine and relatively undisturbed biodiversity hotspot, while recognizing the biocultural significance of the area to local Chumash tribes. **OPC recommends that CFGC approve the proposed new Point Sal SMCA.**

Petition 2023-29MPA_AM2: Add a new MPA near Carpinteria (Mishopshno SMCA)

The Santa Ynez Band of Chumash Indians, Natural Resources Defense Council, and Environmental Defense Center have proposed the designation of a new SMCA near Carpinteria, California, located approximately twelve miles southeast of Santa Barbara. The proposed new MPA, to be named Mishopshno in honor of a nearby Chumash coastal village, would protect key nearshore ecosystems in the Santa Barbara Channel, including a large portion of Carpinteria Reef. As amended by petitioners at the April 14, 2026 meeting of CFGC's Tribal Committee[21], the proposed new Mishopshno SMCA would span nearly 4 miles of shoreline and encompass

21 https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=245526&inline

approximately 9 square miles, from shore to a maximum depth of 141 feet (SeaSketch California 2026). It would prohibit all forms of take except for recreational take of finfish from shore using hook and line, with a tribal take exemption for the Santa Ynez Band of Chumash Indians.

The Santa Barbara Channel is part of a major biogeographic transition zone near Point Conception, separating cold waters to the north of Point Conception from warmer waters to the south (Dever et al. 2004, Johnson & Hartwell 2018). The proposed new Mishopshno SMCA would protect a number of important coastal and marine habitats within the Santa Barbara Channel, including sandy beach, coastal marsh, estuary, and kelp forest habitats (SeaSketch California 2026). Importantly, a new Mishopshno SMCA would provide new protection for Carpinteria Reef, a shallow kelp forest and rocky reef ecosystem that is home to a diversity of marine fishes and invertebrates such as Lingcod, California Sheephead, Kelp Bass, and both red and purple sea urchins (Levenbach 2008, Carr et al. 2017). This reef supports a large kelp patch that, according to Landsat data from 1984-2023 (Bell et al. 2024), has continued to persist despite the recent 2014-2016 marine heat wave and overall declines in the region, making it one of the most stable kelp forests in the Santa Barbara Channel (Fig. 2). The petitioners also note that Carpinteria Reef may serve as an aggregation site for juvenile Great White Sharks, though such aggregations are often highly dynamic and may shift locations from year to year.

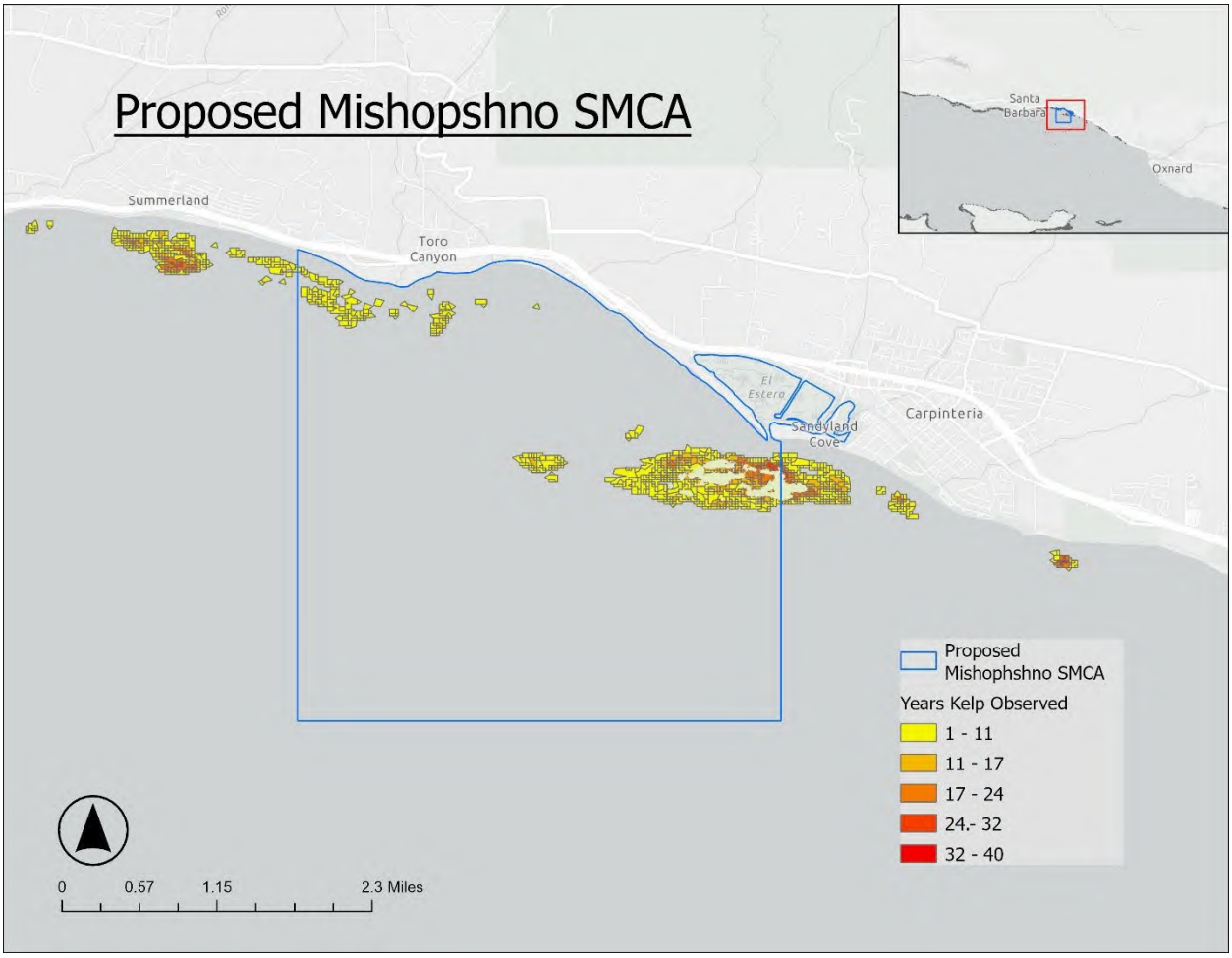


Figure 1. The proposed new Mishopshno SMCA. Satellite monitoring of kelp canopy cover via Landsat from 1984-2023 shows a persistent kelp forest at Carpinteria Reef near the proposed eastern boundary of the SMCA.

In addition to protecting an area of high biodiversity in an ecologically important region of the state, the most significant way in which the proposed Mishopshno SMCA could improve the ecological performance of California's MPA Network is by strengthening connectivity between Campus Point No-Take SMCA to the west and Point Dume SMCA to the southeast. Ensuring that larvae, eggs, spores, or juveniles of marine species are able to move into, out of, or between MPAs is fundamental to the success of California's MPAs as an ecologically connected network. For this reason, science guidance from the MPA planning process included explicit spacing guidelines for MPAs. According to this guidance, in order for MPAs to be within dispersal range for most ecologically and economically important groundfish and invertebrate species, they should be spaced 31-62 miles apart. Currently, the distance between the eastern boundary of Campus Point SMCA and the western boundary of Point Dume SMCA is approximately 60 miles (SeaSketch California 2026). This is very near the upper limit of the spacing guidelines and the largest distance between MPAs in the entire Network.

This distance concerns OPC for multiple reasons. First, while there are several MPAs nearby at the Northern Channel Islands, recent studies suggest the islands may not be as reliably or consistently ecologically connected to the mainland as previously thought due to the presence of small-scale eddies and coastal currents that can impact cross-channel exchange during some oceanographic conditions, while enhancing local retention and alongshore connectivity under others (Dauhajre et al. 2019, Robinette et al. 2012, Harvey et al. 2021). Second, both Campus Point No-Take SMCA and Point Dume SMCA contain kelp forests. Potentially weak connectivity between these habitats could pose risks to kelp resilience in the broader region. Finally, ecological connectivity has the potential to be highly disrupted by the impacts of climate change, which have already been well documented in the Southern California Bight (Magris et al. 2014, Schiff et al. 2019, Wilson et al. 2020, Kekuewa et al. 2022, Frieder et al. 2024). Climate-driven changes in temperature, ocean circulation, and upwelling can dramatically affect larval development, settlement, and survival, with important implications for connectivity (O'Connor et al. 2007, Kendall et al. 2016, Pecl et al. 2017, Pinsky et al. 2019, Wilson et al. 2020). Additionally, in some cases, climate impacts can eliminate important larval source populations entirely, such as when kelp forests are converted to urchin barrens (Rogers-Bennett & Catton 2019, Starko et al. 2024) – potentially making the effective ecological distance between intact protected habitats much greater than the geographic distance between MPA boundaries (Wilson et al. 2020).

The proposed Mishopshno SMCA, which would be located 14.6 miles from Campus Point No-Take SMCA and 44.1 miles from the Point Dume SMR/SMCA cluster (SeaSketch California 2026), would fill the existing large distance between these two MPAs and potentially act as a key "stepping stone" in the Santa Barbara Channel. This has the potential to improve ecological connectivity between Campus Point No-Take SMCA and Point Dume SMCA, especially between the kelp habitats protected by these MPAs, buffer against future climate impacts on connectivity, and strengthen overall resilience in the Santa Barbara Channel. OPC recognizes that the petitioners' proposed allowance for hook-and-line fishing from shore would result in a moderate-low level of protection per science guidance from the MPA planning process, with potential impacts on connectivity; however, continued shore-based fishing access to this area has significant potential to benefit local communities and non-federally recognized tribes.

OPC also recognizes the cultural significance of this area to local Chumash peoples. Members of the Santa Ynez Band of Chumash Indians have described ecosystems within the proposed Mishopshno SMCA as "living homelands and cultural landscapes" where gathering, teaching, ceremony, and other cultural practices have occurred for millennia. The area is also central to Chumash peoples' creation stories and canoe-building traditions. Designation of the proposed Mishopshno SMCA would represent a significant opportunity to protect the biocultural significance of the area and advance co-management with the Santa Ynez Band of Chumash

Indians, supporting the continued stewardship and care of this area's unique coastal and marine biodiversity by its original guardians.

Overall, OPC finds that the proposed new Mishopshno SMCA represents an important opportunity to improve MPA Network design, strengthen ecological connectivity, and recognize the biocultural significance of the area to local Chumash tribes. **OPC recommends that CFGC approve the proposed new Mishopshno SMCA.**

Petition 2023-32MPA: Expand Duxbury Reef SMCA and modify regulations to strengthen protections for intertidal species

The Environmental Action Committee of West Marin has proposed several actions intended to strengthen protections at Duxbury Reef SMCA. As clarified by the petitioner at the April 21, 2026 CFGC regional meeting[22], those actions are: expand the northern and southern boundaries of Duxbury Reef SMCA to protect the majority of Duxbury Reef's contiguous rocky intertidal habitat and modify regulations in Duxbury Reef SMCA to remove the current allowance for shore-based take of finfish by methods other than hook-and-line.

Duxbury Reef SMCA, located at the southern tip of the Point Reyes Peninsula in Marin County approximately one mile west of Bolinas, was designed specifically to protect Duxbury Reef, one of the largest shale reefs in North America and a unique geological feature found nowhere else in California (U.S. Geological Survey 2005). Duxbury Reef is very large and shallow; its broad, low-relief, gently sloping shale platform hosts an extensive network of cracks and crevices that are exposed at low tide and support exceptionally high biodiversity, including iconic intertidal species such as anemones, sea stars, and nudibranchs. It is one of the most accessible and frequently visited coastal sites in the region for tidepooling, and the reef serves as one of California's premier locations for environmental education and tidepool interpretation. Duxbury Reef SMCA was intentionally designed as a narrow, nearshore MPA that extends from the mean high tide line out to 1,000 feet seaward of mean lower low water, protecting intertidal habitat while allowing for commercial and recreational fishing further offshore, as well as recreational take of abalone (when allowed) and finfish from shore.

Currently, Duxbury Reef SMCA does not encompass the full extent of the reef's rocky intertidal habitat. This means that the northernmost and southernmost portions of Duxbury Reef currently receive no MPA protection, despite functioning as part of the same unique and biodiverse ecosystem as the portion of the reef within the existing SMCA. Expanding protections

22 Video available at https://cal-span.org/meeting/cfg_20260421/. Discussion of Petition 2023-32MPA begins at 03:11:24.

northward to Double Point/Stormy Stack Rock Special Closure and southward to the southernmost fringe of the reef, as proposed by petitioners, would capture the vast majority of Duxbury Reef, nearly doubling the amount of rocky shoreline protected by this MPA from 3.26 linear miles to 6.83 linear miles (SeaSketch California 2026) and improving representation of intertidal habitats, one of the rarest and most vulnerable coastal habitats in California, in the North Coast bioregion of the MPA Network (U.S. Geological Survey 2005).

OPC finds that these additional protections have the potential to increase biomass of currently harvested intertidal species, such as seaweed and shellfish, in the expansion areas, bolster overall species richness and diversity at Duxbury Reef, and improve ecological connectivity across the full reef ecosystem. Additional protection could also strengthen the reef's resilience to future climate change impacts, as protected rocky intertidal ecosystems have been found to exhibit greater resistance to, and recovery from, climate-driven disturbances such as marine heat waves compared to unprotected areas, helping to maintain community structure and ecological function during periods of extreme heating (CDFW 2023, Smith et al. 2023). However, OPC also notes that simply expanding the northern and southern boundaries of the existing SMCA could unnecessarily restrict existing boat-based commercial and recreational fishing activities in the proposed expansion areas, such as an important local commercial hook-and-line halibut fishery, that are not currently impacting intertidal biodiversity.

OPC recommends adding new protections for the intertidal in a way that does not change the existing Duxbury Reef SMCA and does not restrict existing commercial or recreational take, beyond new protections for intertidal seaweed and invertebrates, in the expansion areas. To accomplish this, **OPC recommends that CFGC designate two new SMCAs to protect the northern and southern portions of the contiguous rocky intertidal habitat of Duxbury Reef, with take regulations that protect intertidal seaweed and invertebrates (except abalone when allowed) while allowing for existing shore- and boat-based fishing**. We defer to CDFW to recommend final boundaries for these two new SMCAs based on feasibility and enforceability.

Petition 2023-33MPA_AM1: Expand six MPAs statewide and add a new MPA in Santa Cruz

Environment California and Azul have proposed a suite of actions – six proposed MPA expansions and one proposed new MPA – aimed at strengthening protections for kelp forest habitats across the state. Specifically, this petition proposes to expand Cabrillo SMR (southern San Diego), South Point and Gull Island SMRs (Northern Channel Islands), Point Dume SMCA (north of Los Angeles near the Los Angeles County/Ventura County border), Point Conception SMR (north of Santa Barbara), and Natural Bridges SMR (Santa Cruz). It also proposes the designation of a new SMCA at Pleasure Point (Santa Cruz). The proposed expansions and new MPA are aimed at protecting persistent, healthy kelp patches currently unprotected by the MPA

Network. Petitioners argue that protecting these new locations will help improve the resilience of kelp forest ecosystems across the state in the face of anticipated future marine heat waves and other climate stressors.

Kelp forests in California provide a variety of critical ecological functions and ecosystem services. Kelp serves as habitat and an important food source for a rich diversity of invertebrates, fishes, marine mammals, and birds, including ecologically and economically important species such as abalone, rockfishes, and sea otters (Hamilton et al. 2022, Bell et al. 2020). Kelp forests are critical to the well-being of California's coastal residents and the state's multi-billion-dollar ocean economy, providing valuable recreational opportunities such as scuba diving and wildlife viewing (Schiel & Foster 2015, NOAA Office of National Marine Sanctuaries 2025, Monterey Bay National Marine Sanctuary 2025), and kelp forest ecosystems also hold tremendous cultural significance for California Native American tribes. Unfortunately, recent climate-driven changes have resulted in severe and concerning kelp loss in California. A prolonged marine heat wave beginning in 2014 triggered unprecedented declines in California's kelp forests (Rogers-Bennett & Catton 2019, McPherson et al. 2021). Along the North Coast, more than 95% of bull kelp canopy was lost from 2014-2019 and has shown little recovery since then (McPherson et al. 2021), while statewide more than 75% of kelp forests remain below their long-term average in 2024 (Harris et al. 2026). As marine heat waves are expected to become more frequent and more severe as climate change accelerates, supporting the protection and restoration of these vulnerable ecosystems is a top priority for OPC.

Though MPAs cannot directly mitigate climate stressors such as warming ocean waters, petitioners argue that MPAs can support kelp resilience by promoting intact food webs. Specifically, petitioners note that healthy, abundant populations of predatory organisms, such as California Sheephead and California spiny lobster, can keep populations of kelp grazers like sea urchins in check, preventing urchins from overgrazing kelp (Hamilton et al. 2010, Caselle et al., 2015). While this is an active area of research and scientific evidence for the kelp resilience benefits of MPAs is mixed (Cavanaugh et al. 2019), several recent studies in California have demonstrated support for this "trophic cascade" hypothesis.

Eisaguirre et al. (2020) analyzed decades of subtidal monitoring data from the Northern Channel Islands and found that giant kelp density was significantly higher, and purple sea urchin density significantly lower, inside MPAs compared to adjacent fished areas. Kumagai et al. (2024) combined subtidal monitoring data with remotely sensed kelp canopy data to evaluate the statewide response of kelp forests to the 2014-2016 heat wave and found that fully protected MPAs appeared to enhance kelp forests' resistance to, and recovery from, marine heat waves in Southern California. Ortiz-Villa et al. (2025) used four decades of remote sensing data to examine the effects of 54 MPAs on kelp canopy coverage statewide and found that

implementation of MPAs resulted in an 8.5% increase in kelp canopy coverage compared to unprotected areas, with kelp forests in MPAs showing faster and more significant recovery following the 2014-2015 marine heat wave. Finally, results from the first Decadal Management Review of California's MPA Network showed that kelp canopy was more stable and resilient in MPAs, particularly in the South Coast (CDFW 2023).

Importantly, these documented benefits have largely been limited to Southern California, where lobster and Sheephead are abundant. In central California, where these predators are absent or uncommon and the main predator of sea urchins is the southern sea otter, most studies here have found little to no significant differences in urchin or kelp densities between MPAs and unprotected areas (Hamilton et al. 2010, Eisaguirre et al. 2020).

To identify specific areas to target for additional MPA protection, petitioners focused on areas of overlap between highly persistent kelp patches, as identified by Arafeh-Dalmau et al. (2021) using satellite data, and "medium-priority kelp restoration sites" as identified by Giraldo-Ospina et al. (2025) – defined as historically stable kelp beds that resisted the effects of the 2014-2015 marine heat wave and currently have a high proportion of kelp compared to their historical mean. This classification was intended by the authors of this study for use in a kelp restoration context; however, satellite imagery of kelp forest canopy, specifically Landsat data from 1984-2023 (Bell et al. 2024), does show that the areas identified by petitioners appear to be largely persistent over time (Fig. 2, Fig. 3). Given the anticipated impacts of climate change on kelp statewide, especially in the context of a historic new marine heat wave currently forming along the California coast and a predicted "Super El Niño" this year, OPC finds that, from a precautionary standpoint, protecting additional persistent kelp within the MPA Network is worth exploring at a limited scale.

Of the actions proposed in the petition, OPC recommends that CFGC deny the proposed expansion of Natural Bridges SMR and deny the proposed designation of a new SMCA at Pleasure Point. Both of these areas are located in Santa Cruz, at the northern end of the Monterey Bay. As described above, empirical support for the hypothesized "trophic cascade" benefits of MPAs for kelp has not been found in central California. Additionally, the proposed new MPA at Pleasure Point would not meet minimum guidelines for MPA size or level of protection, making it unlikely to accomplish biodiversity conservation objectives.

The remaining proposed actions are all focused on Southern California, where MPAs may promote improved kelp resilience by promoting trophic cascades. Of these actions, **OPC recommends that CFGC deny the proposed expansion of Cabrillo SMR.** Per the U.S. Navy, this proposed expansion has the potential to impact military readiness in the area. **OPC recommends that CFGC deny the proposed expansions of South Point SMR and Gull Island**

SMR; these proposed expansions would compromise the decades-long, deeply institutionalized state-federal partnership to co-manage the existing Channel Islands MPAs, which currently protect 20% of state waters around the Northern Channel Islands in no-take marine reserves. The proposed expansion of South Point SMR in particular would result in a misalignment with the boundaries of the neighboring Federal Marine Reserve.

OPC recommends approval, with modifications, of the remaining two proposed actions in Southern California (expansion of Point Dume SMCA and Point Conception SMR).

Point Dume SMCA. Located just offshore of Malibu in Los Angeles County, the existing Point Dume SMCA currently protects nearly 16 square miles of sandy beach, rocky shoreline, and kelp forest, as well as portions of a submarine canyon extending more than 2,000 feet deep. Petitioners propose expanding the existing Point Dume SMCA to the west by 4.6 square miles, approximately a 29% expansion, to protect a portion of a large, persistent kelp bed immediately adjacent to the SMCA. This expansion would increase the amount of kelp protected by the SMCA from 1.2 linear miles to 2.9 linear miles (SeaSketch California 2026, Fig. 3). **OPC recommends that CFGC approve the proposed expansion of Point Dume SMCA**. Petitioners have also proposed an adjustment to the take allowance at Point Dume SMCA to allow additional recreational take, including a new take allowance for recreational shore-based hook-and-line fishing. **OPC recommends that CFGC deny the proposed additional take allowance at Point Dume SMCA**, as this would drop the SMCA's Level of Protection from high to moderate-low such that it would no longer serve as a replicate MPA for kelp, beach, rocky intertidal, and soft bottom habitats.

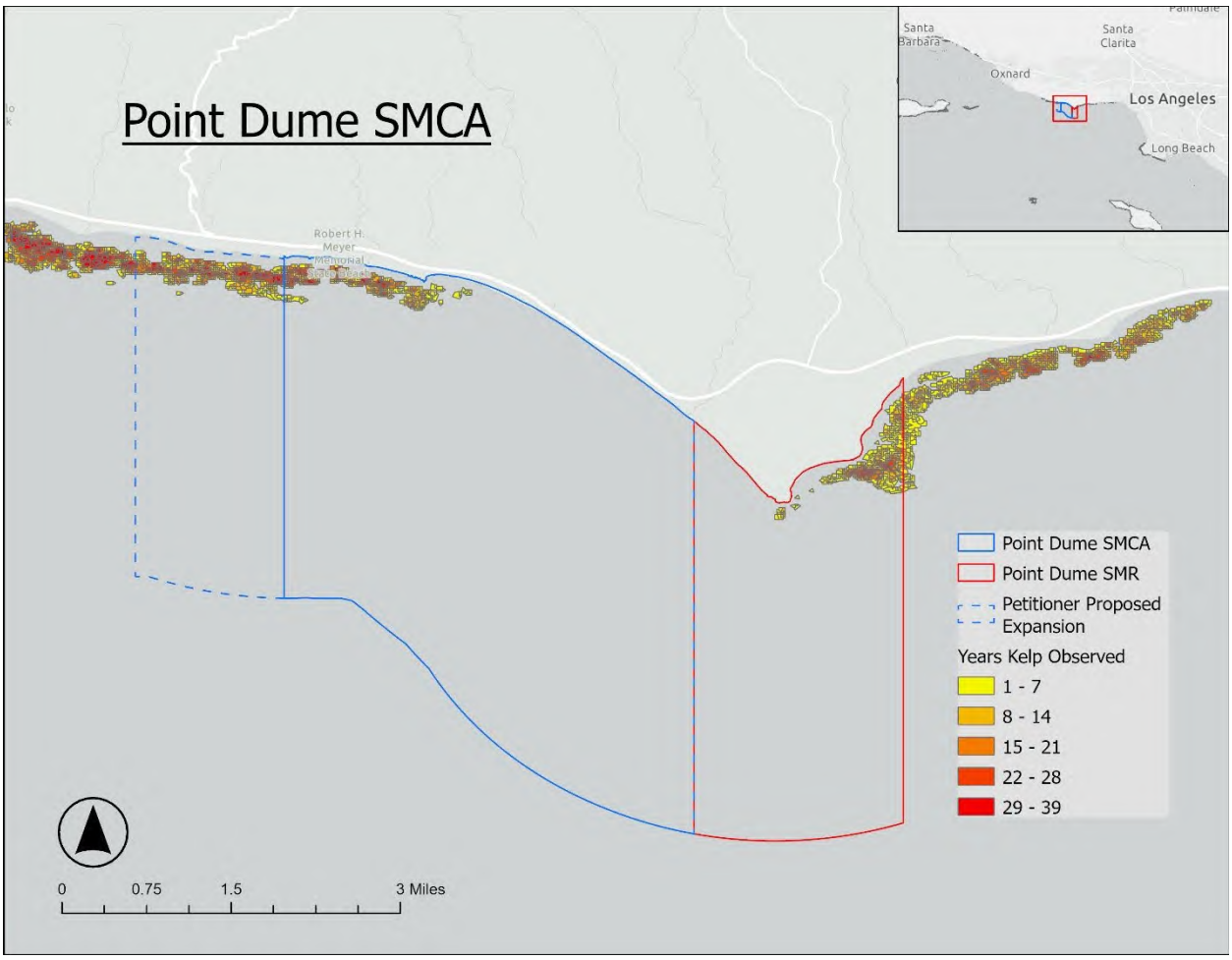


Figure 2. Point Dume SMCA and SMR, with petitioners' proposed expansion of Point Dume SMCA shown.

Point Conception SMR. Located at a major biogeographic transition zone, Point Conception SMR currently protects more than 22 square miles of rocky reefs, surfgrass beds, and kelp forests. Petitioners propose expanding the existing Point Conception SMR to the east by 14.6 square miles, which would include a very large patch of persistent kelp (Fig. 3). However, given the existing large size of this MPA, OPC finds that a smaller expansion, similar to the scale of expansion proposed for Point Dume SMCA, is more appropriate and would capture a significant portion of persistent kelp while maintaining some continued fishing access in this area. **OPC recommends that CFGC expand Point Conception SMR by shifting the eastern boundary of the SMR from the current 120° 25.000' W longitude line eastward to the 120° 23.000' W longitude line** (Fig. 3). This would expand the SMR by 7.65 square miles, approximately a 35% expansion, and increase the amount of kelp protected by the SMR from 2.27 linear miles to 4.44 linear miles (SeaSketch California 2026).

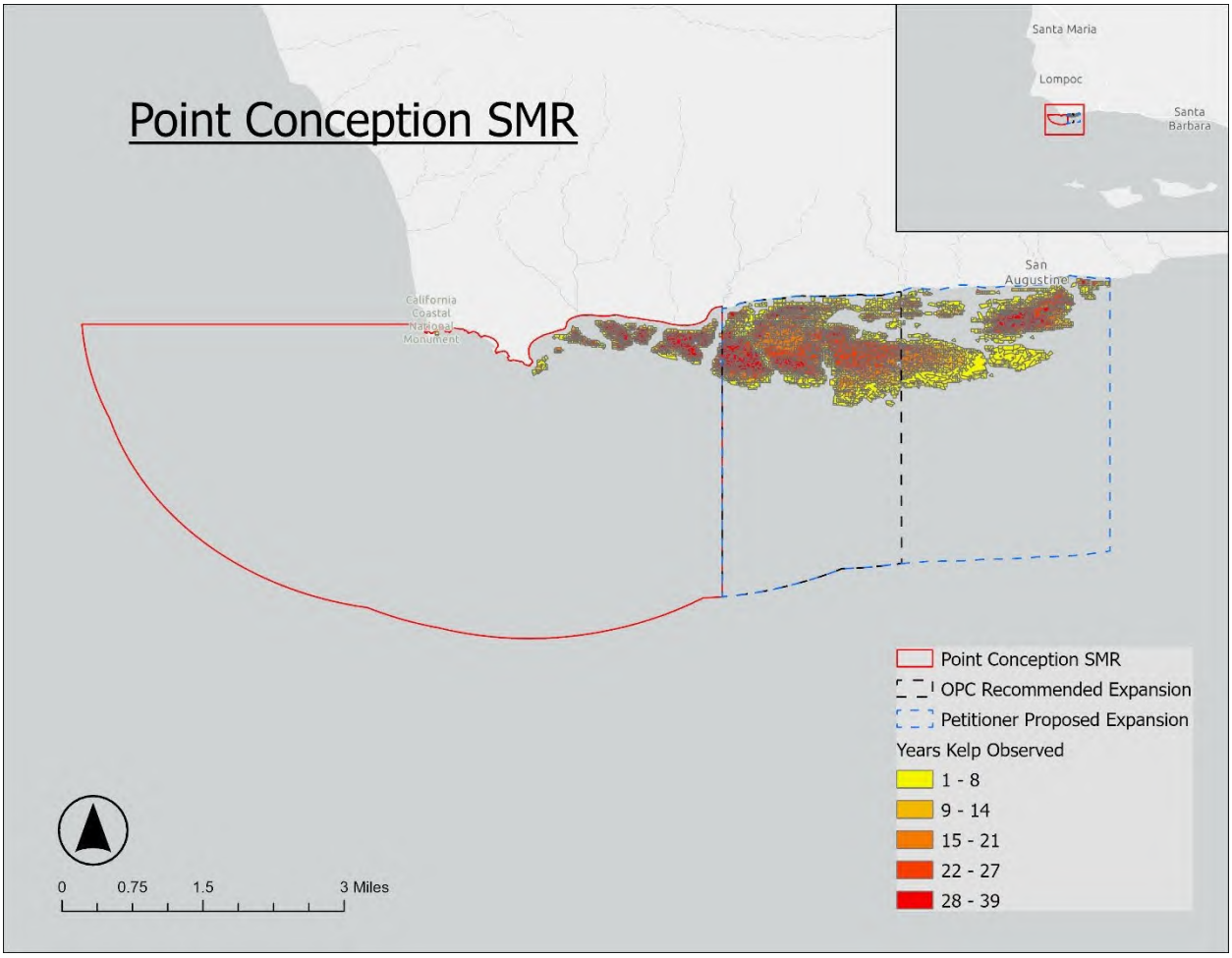


Figure 3. Point Conception SMR with petitioners' proposed expansion (blue dotted line) and OPC's recommended expansion (black dotted line) shown. OPC's recommended expansion encompasses much of the persistent kelp immediately adjacent to Point Conception SMR.

Recommendations At-a-Glance

Table 2. OPC's recommendations on all MPA petitions currently under consideration by CFGC.

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-14MPA	Nine SMCAs statewide (existing)	California Sea Urchin Commission	Allow commercial take of sea urchin in various MPAs	Deny
2023-15MPA_AM	Footprint SMR, Gull Island SMR, and Santa Barbara Island SMR (existing)	Blake Hermann	Reclassify SMRs to SMCAs to allow limited take of highly migratory species and possession of coastal pelagic species, or the take of pelagic finfish	Deny
2023-16MPA	Stewarts Point SMR and Bodega Head SMR (existing)	Bodega Bay Fisherman's Marketing Association	Reclassify SMRs to SMCAs to allow commercial take of salmon by trolling	Deny
2023-18MPA	Vandenberg SMR, Kashtayit SMCA, and San Miguel and Anacapa Island Special Closures (existing)	Ocean Conservancy	Multiple actions to modify allowed uses at several Santa Barbara Channel MPAs	Deny

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-19MPA	Chitqawi SMCA (new)	Santa Ynez Band of Chumash Indians	Add a new MPA near Morro Bay	Deny
2023-20MPA_AM1 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Point Buchon SMCA and Point Buchon SMR (existing)	Santa Ynez Band of Chumash Indians	Add a tribal take exemption at Point Buchon SMCA, rename Point Buchon SMCA, and adjust northern boundary of Point Buchon SMR	Approve tribal take exemption and renaming; deny proposed boundary change
2023-21MPA_AM1 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Pyramid Point SMCA (existing)	Tolowa Dee-ni' Nation	Remove recreational take of true smelt in Pyramid Point SMCA and adjust northern boundary of Pyramid Point SMCA	Approve proposed removal of recreational take of true smelt; deny proposed boundary change
2023-23MPA_AM1	Various MPAs in Monterey County (existing)	Giant Giant Kelp Restoration Project	Modify several regulations related to kelp restoration, including allowing urchin culling in Monterey MPAs; establish a new SMR at Tankers' Reef	Deny

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-24MPA_AM1	Laguna Beach No-Take SMCA and Dana Point SMCA (existing)	Laguna Bluebelt Coalition	Extend the southern boundary of the Laguna Beach No-Take SMCA to the southern border of Laguna Beach	Deny
2023-27MPA_AM1 (as clarified at the May 6, 2026 CFGC regional meeting)	Anacapa Island SMCA (existing)	Environmental Defense Center	Modify regulations at Anacapa Island SMCA to protect sensitive eelgrass habitats (with several options proposed)	Modify SMCA regulations to prohibit the deployment of lobster traps shallower than 50 feet
2023-28MPA_AM2 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Point Sal SMCA (new)	Northern Chumash Tribal Council and Natural Resources Defense Council	Add a new MPA near Point Sal	Approve the proposed new Point Sal SMCA
2023-29MPA_AM2 (as amended at the April 14, 2026 CFGC Tribal Committee meeting)	Mishopshno SMCA (new)	Santa Ynez Band of Chumash Indians and Natural Resources Defense Council	Add a new MPA near Carpinteria	Approve the proposed new Mishopshno SMCA

Petition Number	MPA(s) Affected	Petitioner	Proposed Action	OPC Recommendation
2023-32MPA (as clarified at the April 21, 2026 CFGC regional meeting)	Duxbury Reef SMCA (existing)	Environmental Action Committee of West Marin	Expand Duxbury Reef SMCA and modify regulations to strengthen protections for intertidal species	Designate two new SMCAs to protect the northern and southern portions of Duxbury Reef, each with take regulations that protect intertidal seaweed and invertebrates while allowing for continuation of other existing shore- and boat-based fishing
2023-33MPA_AM1	Various existing MPAs and one proposed new MPA	Environment California and Azul	Expand six existing MPAs statewide and add a new MPA in Santa Cruz	Approve proposed expansion of Point Dume SMCA, but deny proposed additional take allowance in Point Dume SMCA. Approve a smaller expansion of Point Conception SMR. Deny proposed expansion of Natural Bridges SMR, Cabrillo SMR, South Point SMR, or Gull Island SMR. Deny proposed designation of a new SMCA at Pleasure Point.
2023-34MPA	Point Buchon SMCA, Farnsworth Onshore and Offshore SMCAs (existing)	Environment California and Azul	Reclassify Point Buchon SMCA to an SMR to prohibit take; Remove all take except for recreational spearfishing in Farnsworth Onshore and Offshore SMCAs	Deny

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OPC Staff Recommendations on MPA Petitions

California Fish and Game Commission Meeting – August 12, 2026

Jenn Eckerle, CNRA Deputy Secretary for Oceans and Coastal Policy/OPC Executive Director

California's MPA Network – the global gold standard

Only network of protected areas in the world recognized on the IUCN Green List

- Science-based and community-driven design
- Ongoing adaptive management
- Ecological and social benefits

Foundation of 30x30 in coastal waters

- Covers 16.2% of coastal waters, more than half of the 30x30 target
- Not the only strategy to achieve 30x30



OPC's role in MPA Management

We are responsible for the direction of MPA policy

- Set strategic priorities for the Network
- Convene the MPA Statewide Leadership Team
- Direct funding to MPA research, monitoring, enforcement, outreach, and restoration

Our 2026-2030 Strategic Plan includes an explicit objective to strengthen the performance and durability of the MPA Network



OPC's approach to MPA petitions

OPC's recommendations on petitions are **rooted in a precautionary approach**

In the face of a changing climate, California's MPA Network is one of our state's most effective tools for **safeguarding biodiversity** and **building climate resilience**

OPC staff looked for opportunities to bolster the types of MPA benefits anticipated to serve as an **"insurance policy" against changing ocean conditions**





OPC's approach to MPA petitions

OPC does not recommend approval of any petitions that would weaken the existing MPA Network (Petitions 2023-14MPA, 2023-15MPA_AM, 2023-16MPA, 2023-18MPA, and 2023-23_MPA_AM)

Any actions that would roll back existing protections have the potential to compromise existing conservation benefits of the MPA Network



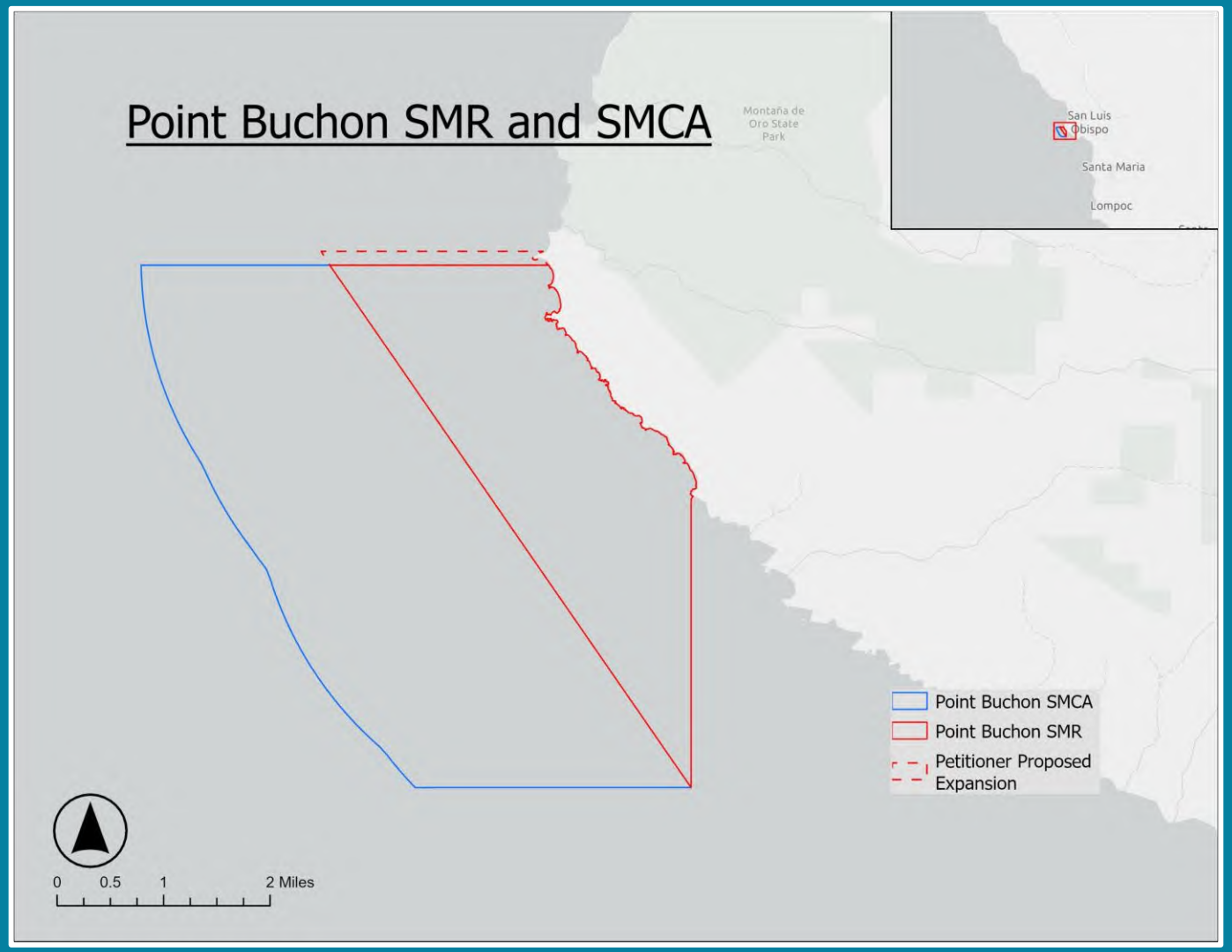
OPC's approach to MPA petitions

Of the petitions that would **strengthen the MPA Network**, OPC considered whether or not proposed actions would:

- **Improve MPA Network design**
- Result in **meaningful additional biodiversity protections** beyond what the current MPA Network already provides
- **Support and revitalize tribally-led stewardship**

Based on these considerations, OPC recommends approval of the following petitions:

Point Buchon SMCA and SMR (2023-20MPA_AM1)

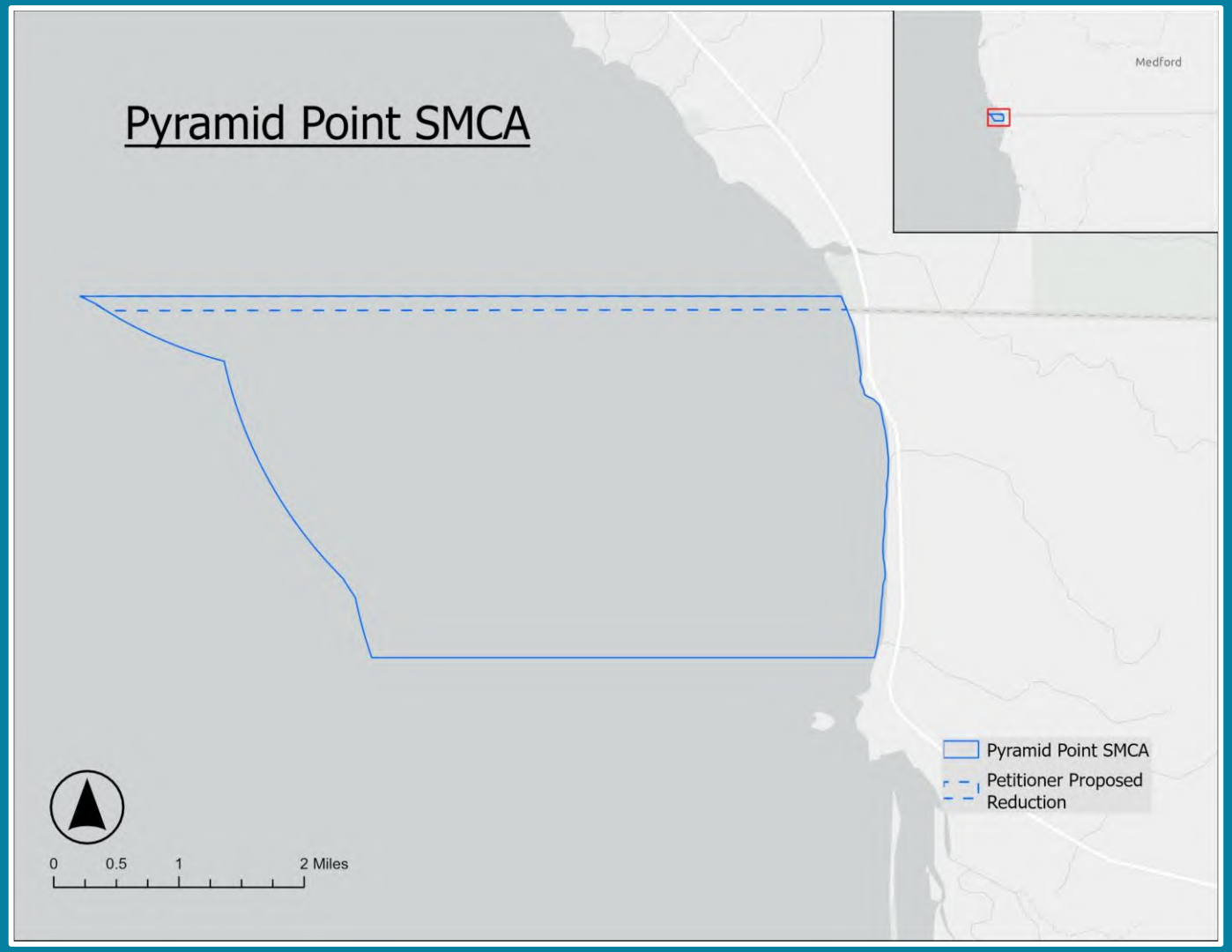


Proposed Action: Add a tribal take exemption at Point Buchon SMCA, rename Point Buchon SMCA, and adjust northern boundary of Point Buchon SMR

Petitioner: Santa Ynez Band of Chumash Indians

OPC Recommendation: Approve tribal take exemption and renaming; deny proposed boundary change

Pyramid Point SMCA (2023-21MPA_AM1)

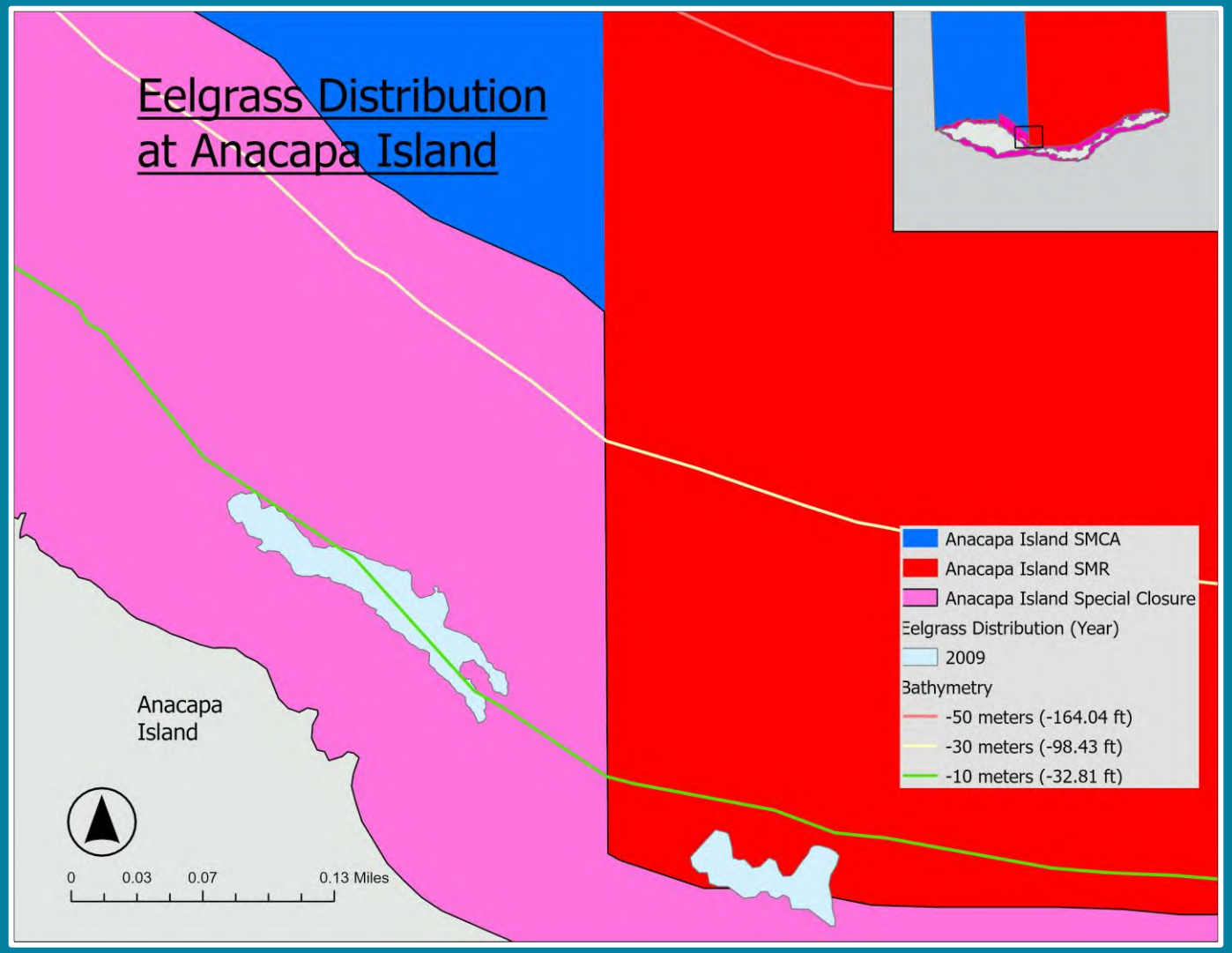


Proposed Action: Remove recreational take of true smelt at Pyramid Point SMCA and adjust the SMCA's northern boundary

Petitioner: Tolowa Dee-ni' Nation

OPC Recommendation: Approve proposed removal of recreational take of true smelt; deny proposed boundary change

Anacapa Island SMCA (2023-27MPA_AM1)

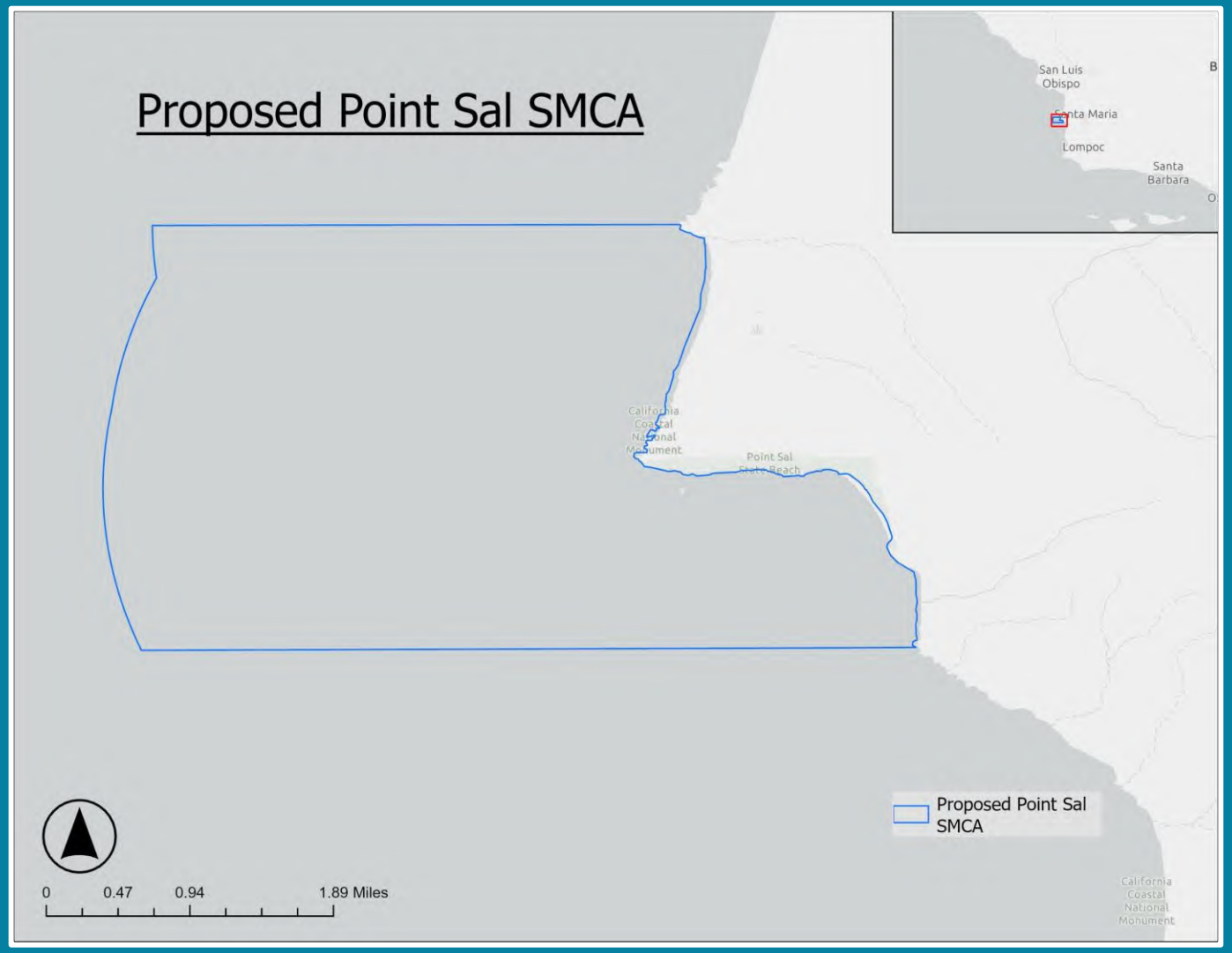


Proposed Action: Modify regulations at Anacapa Island SMCA to protect sensitive eelgrass habitats (several options proposed)

Petitioner: Environmental Defense Center

OPC Recommendation: Modify SMCA regulations to prohibit the deployment of lobster traps shallower than 50 feet

Point Sal SMCA (2023-28MPA_AM2)

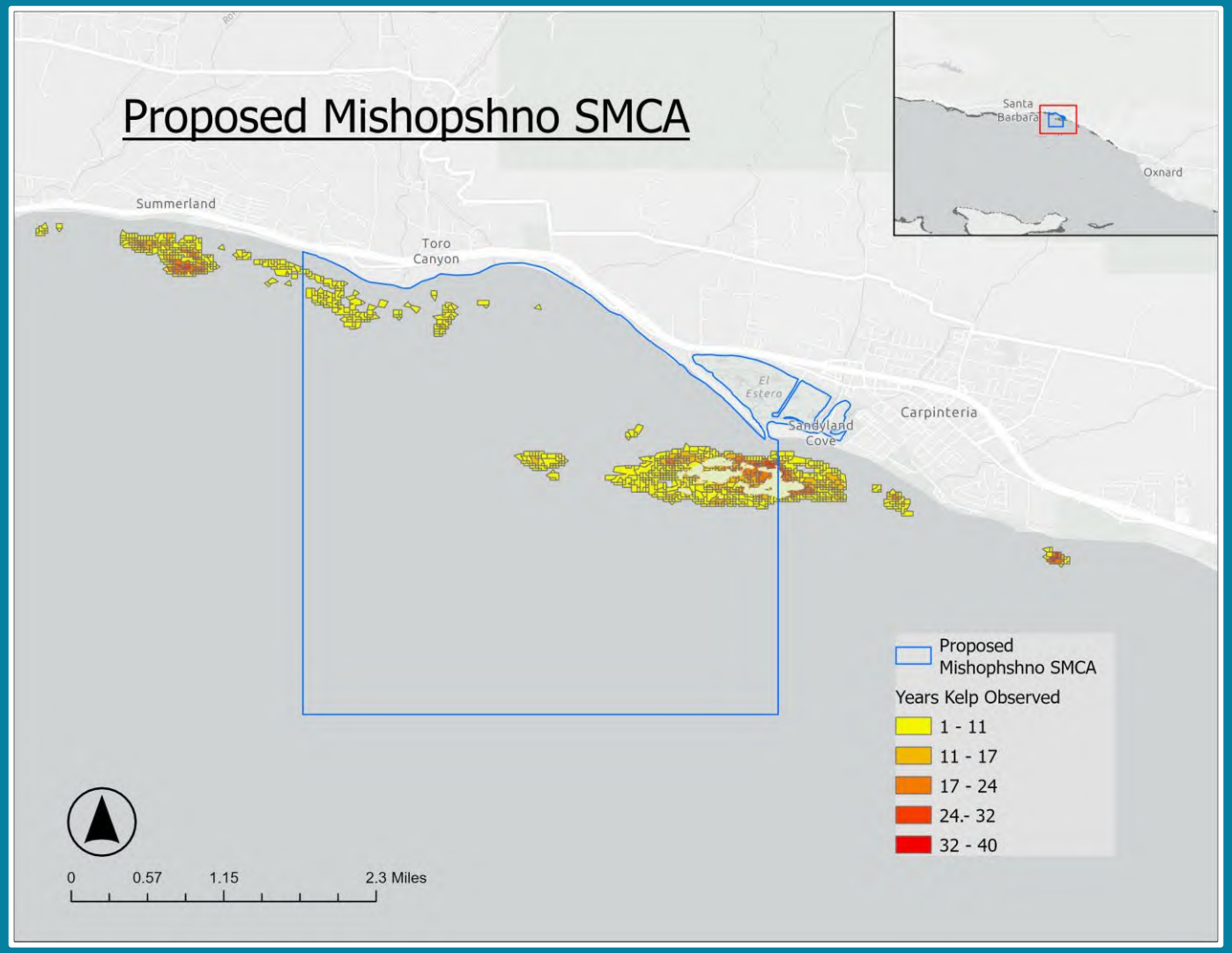


Proposed Action: Add a new SMCA near Point Sal

Petitioner: Northern Chumash Tribal Council and Natural Resources Defense Council

OPC Recommendation: Approve the proposed new Point Sal SMCA

Mishopshno SMCA (2023-29MPA_AM2)

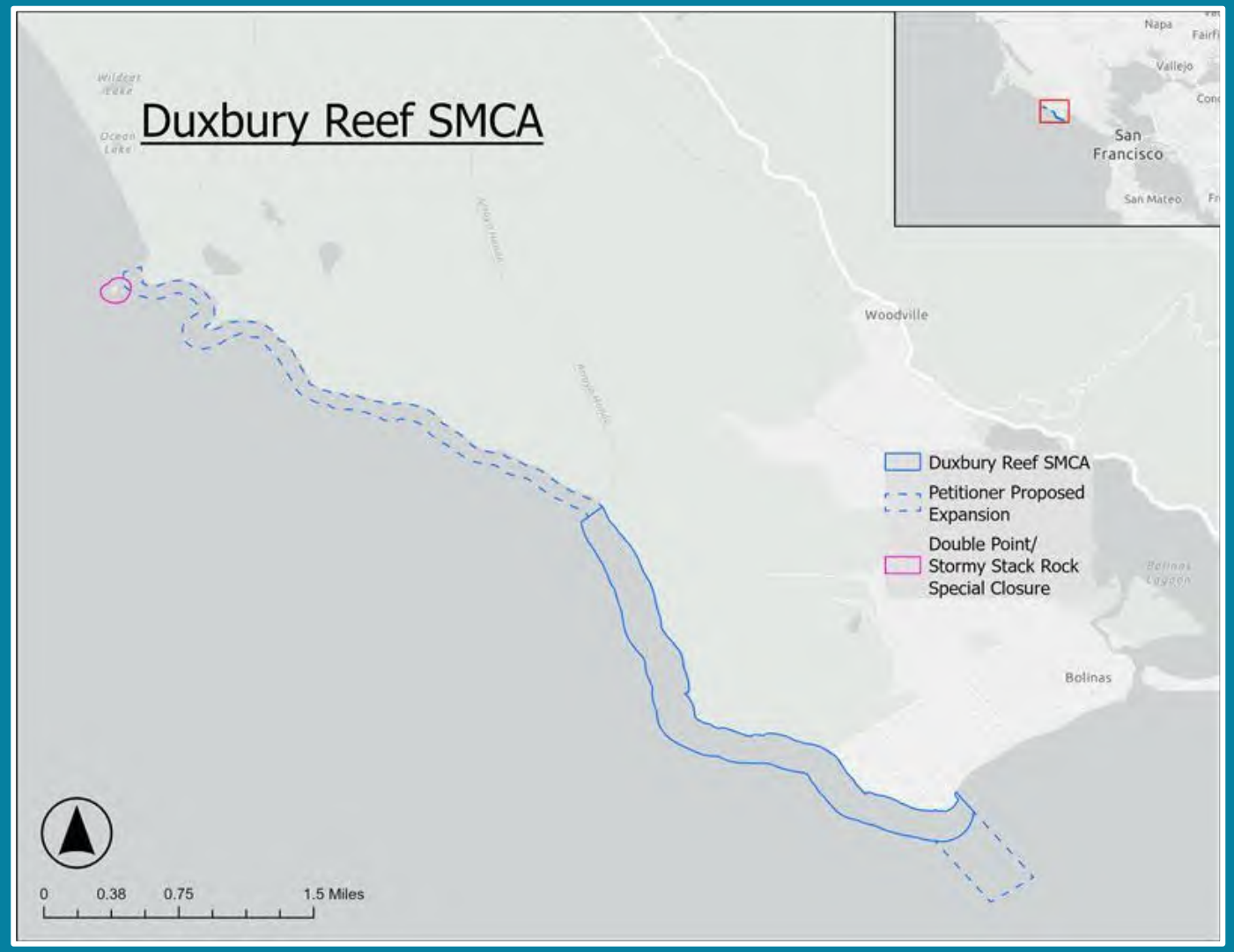


Proposed Action: Add a new MPA near Carpinteria

Petitioner: Santa Ynez Band of Chumash Indians and Natural Resources Defense Council

OPC Recommendation: Approve the proposed new Mishopshno SMCA

Duxbury Reef SMCA (2023-32MPA)

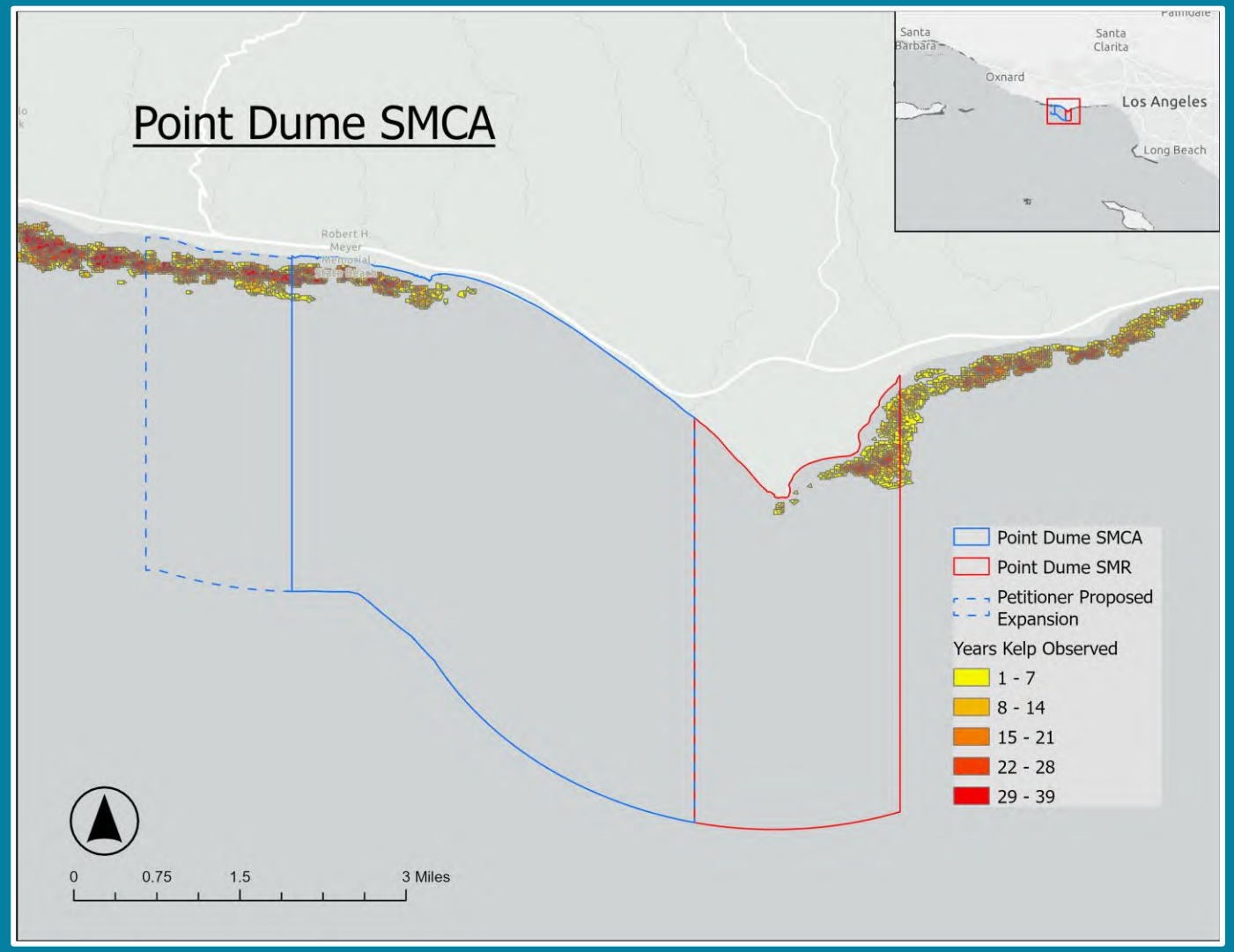


Proposed Action: Expand Duxbury Reef SMCA and modify regulations to strengthen protections for intertidal species

Petitioner: Environmental Action Committee of West Marin

OPC Recommendation: Designate two new SMCAs to protect the northern and southern portions of Duxbury Reef (intertidal protections only)

Point Dume SMCA (2023-33MPA_AM1)

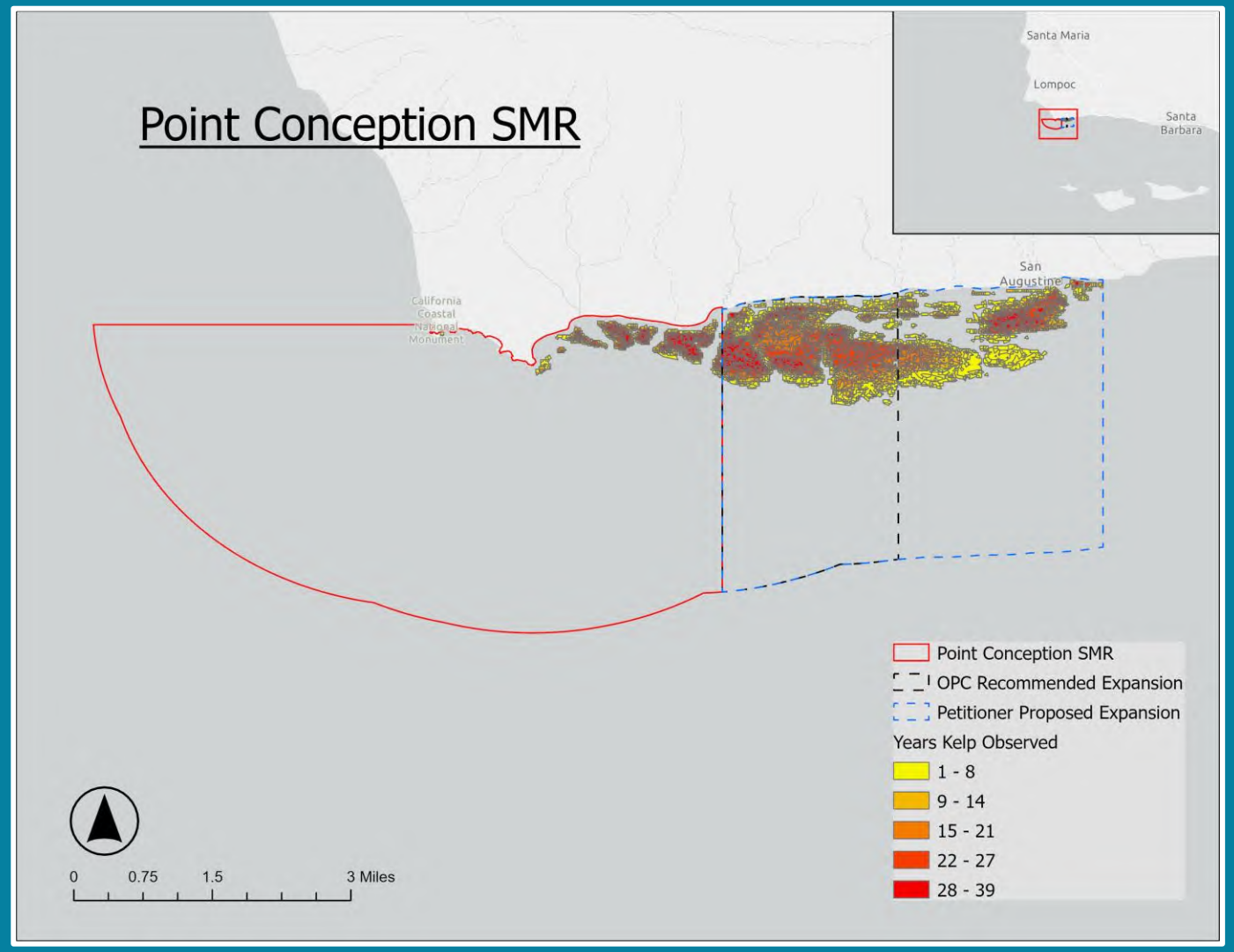


Proposed Action: Expand the existing Point Dume SMCA and allow additional recreational take from shore

Petitioner: Environment California and Azul

OPC Recommendation: Approve proposed expansion, but deny proposed additional take allowance

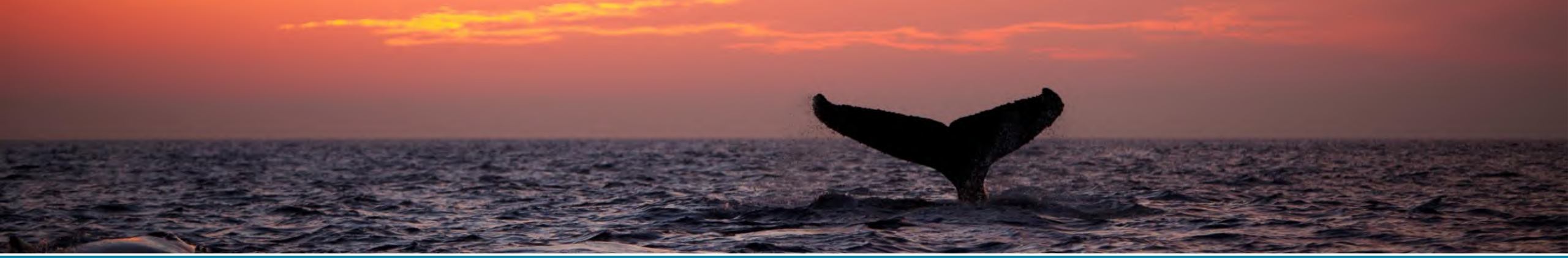
Point Conception SMR (2023-33MPA_AM1)



Proposed Action: Expand the existing Point Conception SMR

Petitioner: Environment California and Azul

OPC Recommendation: Approve a smaller expansion of Point Conception SMR



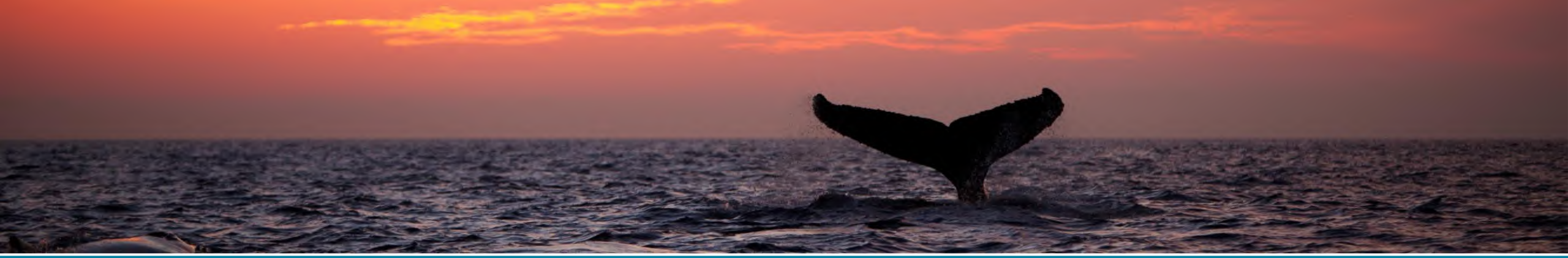
Chitqawi SMCA (2023-19MPA)

Proposed Action: Add a new MPA near Morro Bay

Petitioner: Santa Ynez Band of Chumash Indians

OPC Recommendation:

- Deny due to challenges associated with the location of the proposed SMCA immediately adjacent to Morro Bay Harbor
- Pursue meaningful co-management with the Santa Ynez Band of Chumash Indians



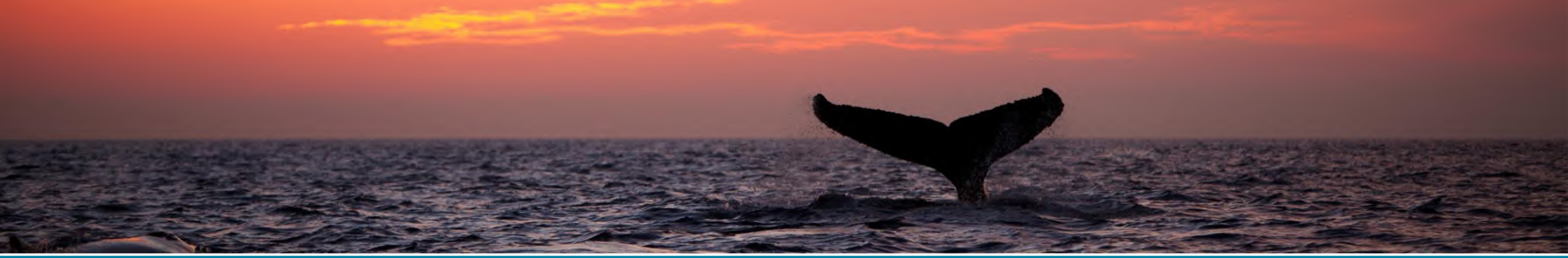
Laguna Beach No-Take SMCA (Petition 2023-24MPA_AM1)

Proposed Action: Extend the southern boundary of the Laguna Beach No-Take SMCA to the southern border of Laguna Beach

Petitioner: Laguna Bluebelt Coalition

OPC Recommendation:

- Deny due to potential enforcement challenges



Point Buchon SMCA, Farnsworth Onshore and Offshore SMCAs (Petition 2023-34MPA)

Proposed Action: Reclassify Point Buchon SMCA to an SMR to prohibit take; remove all take except for recreational spearfishing in Farnsworth Onshore and Offshore SMCAs

Petitioner: Environment California and Azul

OPC Recommendation:

- Deny due to lack of demonstrated compliance issues

Moving Forward

OPC appreciates the robust conversation around MPA petitions to date

Regional meetings this spring made it clear that **many communities, especially environmental justice communities, face significant barriers** to accessing the coast and ocean and participating in decision-making



Moving Forward

We are committed to:

- Continuing our support for **research and monitoring** to adaptively manage the Network into the future
- Expanding **equitable access** to the coast and ocean
- Advancing **tribally-led stewardship**
- Supporting a **sustainable blue economy** and **thriving fishing communities**





CALIFORNIA OCEAN PROTECTION COUNCIL

Thank you!

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Received July 31, 2026;
Original signed copy on file

MEMORANDUM

Date: July 30, 2026

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

From: Jaimie Huynh
Deputy Director for Strategic Engagement, Equity, and Partnerships
California Department of Fish and Wildlife

Subject: Initial Assessment of Question 14 (Equitable Access) and Question 16 (CFGC JEDI Policy) of the 2025 MPA Petition Evaluation Framework

At its February 14-15, 2024 meeting, the California Fish and Game Commission (CFGC) referred 20 Marine Protected Area (MPA) petitions to the California Department of Fish and Wildlife (CDFW) for review, evaluation, and recommendation. CDFW completed the Evaluations and Recommendations for the ten non-Tribally-led petitions and the Companion Document in March of 2026, which were received by CFGC at their April 15-16, 2026 meeting. The Evaluations and Recommendations and the Companion Document did not include answers to Questions 14 and 16 of the 2025 MPA Petition Evaluation Framework.

- 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?

- Question 16: Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion (JEDI) Policy?

At the May 2026 Regional Petition Meeting, CFGC requested that Question 14 and Question 16 be answered to inform CFGC decisions on the Bin 2 petitions.

CDFW, the Ocean Protection Council, and the California Natural Resources Agency jointly completed and is transmitting the initial assessment of Question 14 and Question 16 (see attached) to CFGC. The assessment acknowledges the history of exclusion from the coast and MPA Initiative planning process experienced by California Native American tribes and disadvantaged communities; includes an inventory to provide CFGC with an improved understanding of how petitions may impact equitable access to the coast and MPAs; presents an evaluation of petitions for the CFGC JEDI Policy actions; and provides future opportunities to improve tribal and community engagement, invest in social, cultural, and access-related research, and adopt policies to guide environmental justice and equity work.

Addressing imbalances in representation and incorporation of equity considerations into management and decision-making ensures the benefits of conservation are shared fairly for all Californians. Diverse perspectives strengthens public support, improves stewardship, and contributes to more resilient ecosystems. There are meaningful opportunities to repair past harms, ensure appropriate avenues for formal tribal engagement, and build a process that is inclusive of and welcoming for communities of color.

If you have any questions or need more information, please contact me at Jaimie.huynh@wildlife.ca.gov.

ec: Meghan Hertel, Director
California Department of Fish and Wildlife

Chad Dibble, Deputy Director
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Kevin Thomas, Deputy Director
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Craig Schuman, Marine Regional Manager

Jenn Eckerle, Deputy Secretary for Ocean and
Coastal Policy Natural Resources Agency

Noaki Schwartz, Senior Deputy Director Coastal
Commission

Geneva E.B. Thompson, Deputy Secretary for
Tribal Affairs Natural Resources Agency



CALIFORNIA MARINE PROTECTED AREAS

Initial Assessment of Q14 & Q16 of the **2025 MPA Petition Evaluation Framework**

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INTRODUCTION

California's iconic 1,100-mile coastline provides immeasurable ecological, cultural, social, and economic value to residents and visitors. It provides a place for recreation, connection to nature, spiritual and traditional practices, and drives a thriving $51 billion coastal economy that supports local jobs and businesses.

Acknowledging Historic Exclusion from the Coast

Tribes

All the lands, waters, and natural resources within the boundaries of what is now known as California, have been – and still are – stewarded by California Native American tribes and tribal people since time immemorial. Tribal expertise, Traditional Ecological Knowledge, tribal science, ceremonies, customs, and practices are tied to these places and are critical components of best available science used to steward the lands and waters.

The early decades of California's statehood were marked by widespread violence, exploitation, dispossession, and the attempted destruction of tribal communities. Today, many of the persistent inequitable conditions that tribal communities continue to experience are a direct result of the historical wrongs committed against California Native American tribes by the State of California.

Disadvantaged Communities

Although California has many policies and programs designed to increase access to the coast, history shows that access has not always been equitable. Throughout the twentieth century, discriminatory laws, policies, and practices also restricted coastal access for many minority communities. Both tribal communities and communities of color faced exclusionary zoning, racially restrictive covenants, intimidation, and violence that barred them from beaches, coastal resorts, and waterfront neighborhoods. Some beaches were designated explicitly as "whites only," while others used targeted law enforcement to discourage minority families from gathering. These injustices were not isolated incidents but part of broader systems of segregation that shaped who could participate in coastal life and who was pushed away from it.

Historic inequalities, as well as California's growing population, changing demographics, socio-economic forces, judicial decisions, and policy choices have and continue to shape development patterns and population shifts that widen the disparity gap. The passage of the California Coastal Act and decades of advocacy have expanded coastal access but many low-income and minority communities continue to face significant barriers. This includes lack of transportation, lack of affordable accommodations, and illegal barriers to access such as fake no parking signs.

Understanding the history of exclusion along the coast is important as proposed changes to the marine protected areas (MPA) network are being considered.

History of MPA Planning Process

The creation of the MPA network we see today was initially not appropriately inclusive of California Native American tribes, despite their long history of use, protection, and stewardship of marine resources and interest in caring for coastal ecosystems. The Marine Life Protection Act (MLPA) Initiative was silent on tribes and the implementation process did not include a formal mechanism for tribal consultation and participation; it instead invited tribes to participate as stakeholders rather than as representatives of tribes. (Berkey & Williams, 2019) While the history of exclusion is not fully discussed in this analysis, it is important to acknowledge this history and attempt to include California Native American tribes throughout the current and future MPA process.

The MLPA Initiative planning process was not appropriately inclusive or welcoming of people of color. Although participation was open to all, the structure of the process did not include intentional outreach to marginalized coastal users, relied on stakeholder nominations without dedicated representation for underrepresented communities or communities of color in the process, and lacked outreach and engagement staffing, which made engagement inconsistent across the State. (Sayce et. al., 2013) As a result, early engagement with communities of color and other underrepresented communities was inconsistent across the State.

Addressing these historic imbalances in representation — and incorporation of equity considerations into management and decision-making — helps ensure the benefits of conservation are shared fairly for all Californians. Incorporating diverse perspectives strengthens public support, improves stewardship, and contributes to more resilient ecosystems. There are meaningful opportunities to

repair past harms, ensure appropriate avenues for formal tribal engagement, and build a process that is inclusive of and welcoming for communities of color. This document is meant to inform the Commission's decision making and does not make any conclusions on the petitions themselves.

BACKGROUND

Released in December 2022, the first Decadal Management Review (DMR) assessed the progress of the MPA network in meeting the goals of the MLPA and included 28 recommendations to guide the next ten years of MPA management. In July 2023, in response to public interest, the California Fish and Game Commission (CFGC) agreed to accept public proposals submitted through its established regulatory change petition process, for potential adaptive management modifications to the MPA network. Twenty petitions were received in December 2023, including over 80 individual proposed actions. Ultimately, these petitions were sorted into Bin 1 and Bin 2 petitions. There were a total of five Bin 1 petitions that could be evaluated in the near term and met certain criteria. Decisions on the five Bin 1 petitions were made by CFGC in December 2024. The 15 petitions not meeting those criteria were placed into Bin 2 to be evaluated in the longer term. Additionally, the California Department of Fish and Wildlife (CDFW) sorted the Bin 2 petitions into two groups: "Tribally-Led or Co-led Petitions," which were submitted by a California Native American tribe, representative designated by a tribe or tribal organization, or have a tribal co-sponsor, and "Other Petitions."

In August 2025, the CFGC approved an "evaluation framework" for the remaining 15 Bin 2 Petitions, including the Tribally-led or co-led petitions. The evaluation framework included 18 questions, two of which relate to equity or an existing CFGC equity policy. These questions were added to reflect the commitments of CDFW and CFGC to improving access to marine resources for all Californians, increasing access for traditionally underserved and marginalized communities, and implementing and advancing the CFGC Justice, Equity, Diversity, and Inclusion (JEDI) Policy.

- 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?
- Question 16: Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?

CDFW completed and publicly released its evaluation and recommendation for the ten non-tribally led or co-led Bin 2 petitions. The evaluations were based on petition materials submitted in December 2023 and amendments received through March 14, 2025. Subsequent changes, improvements, or stakeholder engagement undertaken by petitioners after March 14, 2025 did not inform CDFW's evaluation. As outlined in the Companion Document for CDFW's Bin 2 evaluations and recommendations, CDFW originally determined that providing the level of evaluation Questions 14 and 16 and the relevant communities deserve would not be possible within the scope and timeline of the petition evaluations. However, per the request of the CFGC at a regional MPA petitions meeting in May 2026, this document is an initial assessment of Questions 14 and 16 to help inform Commission decisions on the Bin 2 petitions. CDFW staff, California Ocean Protection Council (OPC) staff, and California Natural Resources Agency (CNRA) staff (hereby referred to collectively as, "staff") collaborated to conduct this assessment.

Evaluating the proposed actions in the petitions in context of whether they address equitable access (Question 14) and are consistent with the CFGC's JEDI Policy (Question 16) is only a first step to incorporating equity considerations into the adaptive management of the MPA networks. The State of California is committed to supporting the ongoing and future investments and initiatives to ensure equity is at the forefront of engagement, management, and decision-making processes.

Equity Analysis Considerations for Tribes

The state's current approach to defining environmental justice communities conflates California Native American tribes with disadvantaged communities. In these definitions, tribes are often considered disadvantaged communities, but some tribal representatives have expressed that this term "erodes the self-governing nature of [tribes]" (Haaland & Ortiz, 2022). Additionally, many existing mapping tools "do not provide data from tribal lands and various other local reporting metrics which are not included in census data. Tribes may not fully participate in census and environmental quality data gathering because of historical mistrust of governmental reporting methods, leading to the inability to provide clear metrics for third-party review" (Haaland & Ortiz, 2022). Evaluating tribes under the context of racial equity does not provide the level of engagement tribes deserve nor acknowledges their status as the original

stewards of the land and ocean. For these reasons, tribal lands and ancestral territories are not explicitly included in the analyses presented here. However, consultation with tribes will continue to provide an important venue for assessing how petitions may impact tribal access to the coast and ocean.

Pursuant to the CNRA's Tribal Consultation Policy, California state agencies are directed to engage in early, often, and meaningful tribal consultations with tribes throughout the MPA process. CDFW's Tribal Communication and Consultation Policy reaffirms this process by working collaboratively, communicating effectively, and consulting with California Native American tribes. CDFW plans to update the Tribal Communication and Consultation Policy to align with CNRA's Tribal Consultation Policy in 2027.

Tribal Outreach and Consultation

From May 2024 to June 2026, CDFW provided regular updates on the status of the 2023 MPA petitions and petition evaluation process, offering opportunities to request consultations through email communications and mailed tribal notification letters, to the CDFW statewide tribal contact list. The CDFW tribal contact list includes over 400 individuals across the state who represent and/or work for a California Native American tribe that has been identified by the California Native American Heritage Commission for the purposes of cultural resource protection. Many inland tribes have cultural and historical ties to the coast, so inland tribes are also included in the outreach. A summary of outreach and engagement with tribes is included in the Companion Document. To date, no tribes have requested formal consultation.

At its October 2026 meeting, the CFGC is scheduled to consider action on which petitions to grant and move forward for potential regulatory change. After the vote, there will be additional tribal outreach and consultation opportunities as part of the regulatory change process for any actions/petitions granted by the Commission.

APPROACH TO QUESTION 14 EQUITABLE ACCESS

Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?

Equitable access to the coast and MPAs means something different for every community. For some, meaningful access is rooted in recreational opportunities, such as surfing, swimming, gathering with community, or simply experiencing the outdoor space. For others, the coast can provide for subsistence fishing or traditional food practices.

Defining Terms

Equitable Access

Under the California Natural Resources Agency's Outdoors for All Strategy, "equitable access" is defined as "All people can experience and enjoy California's outdoors regardless of who they are or where they live. It also means that everyone can experience the outdoors in a way that is safe, welcoming, convenient, affordable, and culturally relevant." Equity can be defined in the context of social and racial equity, and means achieving fair outcomes for all groups, while fully acknowledging and addressing unequal starting points. When equity is achieved, no one factor, like race or zip code, can predict individual or community access to quality outdoor spaces (Government Alliance on Race and Equity).

Traditionally Underserved or Marginalized Communities

For purposes of this assessment, "traditionally underserved or marginalized communities" are defined as "disadvantaged or highly impacted communities" (DACs) as identified using CalEnviroScreen 4.0 and Senate Bill 535 (SB535). CalEnviroScreen 4.0 and the SB 535 platform use a variety of environmental justice indicators to identify populations across the state that experience disproportionate environmental and socioeconomic burdens.

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. CalEnviroScreen 5.0 was released on July 1, 2026 and was not used in this assessment due to the release occurring after the assessment had commenced.

SB 535 established initial requirements for minimum funding levels to "Disadvantaged Communities." The California Environmental Protection Agency formally designated four categories of geographic areas as disadvantaged:

1. Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0 (1,984 tracts).

2. Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores (19 tracts).
3. Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0 (307 tracts).
4. Lands under the control of federally recognized Tribes. For purposes of this designation, a tribe may establish that a particular area of land is under its control even if not represented as such on CalEPA's DAC map and therefore should be considered a DAC by requesting a consultation with the CalEPA Deputy Secretary for Intergovernmental Relations at TribalAffairs@calepa.ca.gov.

Methods and Metrics Used

To assess how each petition may affect equitable access, staff compiled an inventory of relevant demographic information, geographical socioeconomic indicators, and coastal access data. Petitioners were encouraged, but not required, to engage with local communities prior to submitting their petitions, so localized needs for access are not captured in this assessment. Staff used existing statewide datasets to develop a snapshot of the current demographic, socioeconomic, and access landscape. The Future Opportunities section includes more discussion about data gaps and approaches for improving future analyses.

Petitions were reviewed using the following components:

1. **Identification of nearby disadvantaged communities**

   The first step in determining which petitions would be included in the equitable access inventory was identifying whether proposed MPA changes were located within 10 miles of a disadvantaged or highly impacted community. "Disadvantaged or highly impacted communities" are defined above.

   The proximity band chosen was a 10-mile radius around the proposed MPA change and only communities within census tracts identified with CalEnviroScreen 4.0 (>75 percentile or higher) or designated as disadvantaged under SB 535 are included.

While Californians travel across the state to access coastal resources, proximity remains one of the strongest predictors of the frequency and regularity of coastal use. A 10-mile radius serves as a practical benchmark for identifying communities most likely to regularly access particular coastal areas for recreation, subsistence activities, exercise, cultural practices, or stewardship activities. In contrast, individuals living farther away may still visit coastal areas, but their use is generally less frequent and more destination-oriented. Therefore, while statewide access is an important consideration, we assessed populations within 10-miles of the coast since those communities are more likely to rely on and regularly engage with a particular coastal area.

After applying the 10-mile DAC filter, seven petitions qualified for further assessment. Appendix A provides the inventory for these seven petitions and presents the demographic and socioeconomic profile of the nearby DACs alongside indicators describing coastal access conditions for the beaches adjacent to the proposed MPA changes.

2. **Demographic and socioeconomic profile of affected communities**
After census tracts were identified through CalEnviroScreen 4.0, staff pulled demographics data from the census tracts within the 10-mile radius. CalEnviroScreen 4.0 demographic and socioeconomic census tract data originate from the U.S. Census Bureau. The demographic context helps clarify whether the petition may influence access opportunities for traditionally underserved groups.

Socioeconomic data, including educational attainment, linguistic isolation, and poverty, are also included in the profile of affected communities. These factors can influence a community's ability to understand regulatory processes, participate in MPA planning, and access the coast.

Educational attainment measures the highest level of education a person has completed. California has a high percentage of people without high school degrees compared to the rest of the United States, which makes education important to consider. Lower educational attainment can limit awareness of regulations governing activities like fishing.

Linguistic isolation is a term used by the U.S. Census Bureau for limited English-speaking households. More than 40% of Californians speak a language other than English at home. Linguistic isolation can make it difficult for residents to understand signage or opportunities for community input on MPA management.

Poverty is determined by the U.S. Census Bureau each year. It is based on the size of the household and the age of family members. If a person or family's total income before taxes is less than the poverty level, the person or family are considered in poverty. Poverty adds an additional barrier to accessing the coast or MPAs and can signify a potential need for subsistence fishing.

3. **Coastal access points and amenities**
   Existing public coastal access points and associated amenities located within half a mile of the proposed MPA changes were identified, using the California Coastal Access, Facilities, Amenities, and Parking Dashboard. This dashboard compiles statewide geospatial information on public coastal access locations and associated amenities and infrastructure, including parking facilities, restrooms, showers, recreational amenities, and other features that facilitate public access and use of coastal resources. The dataset offers a standardized approach for evaluating and comparing access opportunities across different regions of California. The underlying data include more than 1,500 public beach access locations spanning all 15 coastal counties, making it one of the most comprehensive statewide inventories available. This dataset is particularly valuable because it captures both access points and the amenities that influence the quality and practicality of coastal access. Public access is not determined solely by the presence of a beach or shoreline; it is also shaped by supporting infrastructure such as parking, restrooms, accessible pathways, and recreational facilities. By incorporating these attributes, the dataset provides a more complete representation of the opportunities and constraints that coastal users may experience. See Appendix B for coastal access point maps for the eight MPA petitions.

This dataset is intended to provide CFGC commissioners with an improved understanding of how petitions may impact equitable access to the coast and

ocean by identifying disadvantaged communities located within 10 miles of proposed actions, the demographic and socioeconomic composition of those communities, and nearby coastal access points and amenities.

APPROACH TO QUESTION 16 JEDI POLICY

Is the proposed change consistent with the CFGC Justice, Equity, Diversity and Inclusion Policy?

The JEDI Policy adopted by CFGC reflects CFGC's deep commitment to supporting safe and equitable access to California's native wildlife and natural habitats. It emphasizes inclusive decision-making that reflects the needs and values of the state's diverse communities. The policy acknowledges the significant past injustices experienced by underserved communities and seeks to correct the burdens these communities have faced in accessing nature, participating in regulatory decision-making, and the privilege often associated with outdoor access. The JEDI Policy also considers and seeks to correct the disproportionate burdens on California Native American tribes and affirms their interwoven stewardship relationships with the environment.

Identifying Applicable JEDI Policy Actions

The JEDI Policy identifies 13 individual commitments referred to as "actions" that guide how CFGC advances JEDI within both internal and outward-facing practices and procedures. In assessing whether the petitions are consistent with the policy, six actions were deemed to be most applicable for evaluation of petitions, whereas the other seven actions focus on CFGC's internal operations, partnerships, and governance processes. This does not downplay the importance of those seven actions in guiding the CFGC toward its JEDI vision, but rather acknowledges that individual petitions do not influence the CFGC's internal operations, partnerships, and governance. To assess whether each petition is consistent with the JEDI Policy, staff evaluated petitions for the following six remaining actions in the JEDI Policy:

- Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes
- Expand understanding of and improve response to the needs of marginalized fish and wildlife users
- Amplify tribal voices and issues

- Consider the implications of CFGC decisions on subsistence activities
- Improve and champion safe and equitable access to nature and abundant and healthy fish and wildlife populations
- Promote cultural, community, and economic opportunities related to fish and wildlife

Data Sources

The following sources were used when evaluating the petitions for each JEDI Policy action:

- **Information in the petitions and CDFW evaluations and recommendations** Staff considered the action proposed by the petition, information provided in the petitions as well as CDFW evaluations and recommendations for the petitions, if available. As noted under Question 14, petitioners were encouraged, but not required, to engage with local communities prior to submitting their petitions, so localized needs were not captured. Therefore, most of the petitions did not include sufficient information to thoroughly assess benefits and/or impacts to disadvantaged communities. The Future Opportunities section includes more discussion about data gaps and approaches to resolve them.
- **Equitable access considerations from Question 14**

  While equitable access is the main focus of Question 14, Question 16 touches on it as well, with several of these actions in the JEDI Policy relating to equitable access. Therefore, the considerations for equitable access described under Question 14 are relevant to Question 16 as well, including the framing for what equity and equitable access mean and the definition and identification of disadvantaged communities.

Considerations

In addition to overlap between Question 14 and Question 16, there is overlap between the actions themselves on the topics of take, equitable access, and disadvantaged communities.

The following are the primary considerations that were factored into the evaluation of petitions for the six JEDI Policy actions:

- **California Native American tribes**

Since many tribal communities often face similar challenges as communities entitled to environmental justice (e.g. low-income communities or disadvantaged communities) and since the JEDI Policy seeks to correct the disproportionate burdens on California Native American tribes, it was relevant to consider whether petitions were proposed or co-sponsored by California Native American tribes and whether the proposed change would impact tribal cultural practices.

- **Disadvantaged communities**
  Since the JEDI Policy seeks to correct the burdens that disadvantaged communities have faced in accessing nature, participating in regulatory decision-making, and the privilege often associated with outdoor access, it was relevant to consider whether the petition change would impact disadvantaged communities. For the purposes of this evaluation, "marginalized fish and wildlife users" and "historically marginalized communities" are defined as "disadvantaged communities or highly impacted communities" as identified using CalEnviroScreen 4.0 and SB 535."

Staff started evaluating the petition for each JEDI Policy action considering the action proposed by the petition and whether the petition action is being proposed or co-sponsored by a California Native American tribe or a disadvantaged community. None of the petition actions were proposed by disadvantaged communities, so the 10-mile radius proximity band described in Question 14 served as a proxy for evaluating whether a disadvantaged community potentially might be affected by the petition action. Only 19 petitions were proposed or co-sponsored by a California Native American tribe or had a disadvantaged community within a 10-mile radius, so this subset of petitions was evaluated further for considerations related to access, take, and subsistence activities.

Relevant information from the petitions and CDFW evaluations and recommendations, if available, factored into considerations related to access, take, and subsistence activities. For JEDI Policy actions that relate to access or take, staff also considered whether the petition action potentially would expand or restrict access to the area in question and whether the petition action potentially would expand or restrict take. For JEDI Policy actions related to subsistence activities, staff included the added consideration of the U.S. Census

Bureau data on poverty in disadvantaged communities that was included in Q14. Poverty adds an additional barrier to accessing the coast or MPAs and can signify a need for subsistence fishing. If a petition action potentially could affect subsistence activities, staff considered whether there was a disadvantaged community within a 10-mile radius with a poverty level of 75% or higher to evaluate the petition action for JEDI Policy actions related to subsistence activities.

Appendix C is a flowchart that visually walks through the considerations that went into evaluating the petitions for each JEDI Policy action.

Appendix D presents the evaluation of 18 petitions for the six JEDI Policy actions and includes the Question 14 data on the CES 4.0 Indicators for disadvantaged communities. Appendix D only includes petitions that were:

- Proposed or co-sponsored by a California Native American tribe or had a disadvantaged community within a 10-mile radius
- And may advance at least one of the six JEDI Policy actions.

Although there is a disadvantaged community within a 10-mile radius of petition action 2023-18MPA_4, the evaluation concluded that this petition action may not advance any of the six JEDI Policy actions since it would only change the color of the Campus Point SMCA on maps, and therefore this petition action is not included in Appendix D.

FUTURE OPPORTUNITIES

Addressing Meaningful Access

This analysis was done with the best available information. There are still gaps to understanding what meaningful and equitable access to the California coast and MPAs means to communities across California. Some communities may prioritize MPAs, while others rely on the ocean for subsistence fishing, and others for their livelihoods. Similarly, barriers to accessing the coast, ocean, and MPAs will vary among communities as will the solutions to those barriers. Understanding community needs is an important step towards incorporating equity into managing the MPA network and addressing broader equity issues related to coastal and ocean access.

The DMR includes a suite of recommendations to prioritize for the next decade of the adaptive management cycle. These recommendations are the culmination of priority needs to advance and improve MPA governance and partnership coordination. Recommendations to improve tribal coordination include, but are not limited to, improving tribal engagement and relationship building efforts (DMR Recommendation 1), create a clear pathway to tribal MPA management (DMR Recommendation 2), build tribal capacity to participate in MPA management activities (DMR Recommendation 3), and developing a process to incorporate state marine cultural preservation areas into existing MPAs and new locations across the network (DMR Recommendation 24). Recommendations under the justice, equity, diversity, and inclusion pillar include recommendations such as including and funding more diverse researchers and stakeholders in research and monitoring projects that directly contribute to the MPA Monitoring Program (DMR Recommendation 6), expanding targeted outreach and education materials and events to under-represented user groups (DMR Recommendation 7), and evaluating the accessibility of MPAs to various community groups (DMR Recommendation 8).

CDFW, OPC, and CFGC are committed to working collaboratively with tribes, community-based organizations, and non-governmental organizations to conduct community outreach and engagement, including roundtables. This provides a better understanding of community needs, as it is crucial to including tribes and underserved communities as part of the MPA governance process.

Research Opportunities and Investments

The State of California is actively investing in research and monitoring to have a more comprehensive understanding of the social, cultural, and social-ecological dimensions of the MPA network. One ongoing project focuses on who benefits from the MPA network, who faces barriers to access, and how those patterns vary across communities. Through community-engaged surveys, interviews, focus groups, tribal engagement, and geospatial analyses, it will document how different communities access and use coastal and marine resources, the cultural, recreational, and subsistence values they derive from the ocean, and how environmental change and management actions influence those benefits. Anticipated to be complete by Fall 2027, this project will generate critical social baseline information on ocean-dependent activities, values, and experiences that has been identified as a major information gap in

assessing the effectiveness and equity outcomes of California's MPA network. More information on this project and its results can be found here.

In addition, this specific project will evaluate patterns of proximity and accessibility to MPAs, identify disparities affecting disadvantaged, vulnerable, underserved, and tribal communities, and develop standardized profiles that characterize access opportunities and barriers across the MPA network. A key component of this work will be the evaluation and comparison of multiple environmental justice screening tools and indicators, including CalEnviroScreen, EPA EJScreen, the Vulnerable Communities Platform, and the California Climate Investments Priority Populations Mapping Tool, to better understand how different frameworks identify disadvantaged, vulnerable, and underserved communities. By examining the strengths, limitations, geographic patterns, and areas of agreement among these tools, the project will elucidate strategies to select and interpret environmental justice metrics for use in MPA planning and evaluation. The research will provide actionable information that can help advance DMR recommendations and recommendations on ways to enhance equitable access and participation in MPA management and decision-making processes, and to advance environmental justice, climate resilience, and inclusive stewardship of California's coastal and marine resources.

Defining Subsistence

The CFGC's Tribal Committee is pursuing defining 'subsistence' to clarify how the word should be applied to management in relation to tribes. The outcome can help inform development of a potential definition for broader use with public subsistence fishing/harvesting.

Adopting Environmental Justice Policies

The California Natural Resources Agency recently published "Helping Californians Thrive - Environmental Justice and Equity Policy." The Policy calls for broad public input to inform government decisions amongst other actionable items to achieve equitable outcomes for all Californians. CDFW and CFGC will formally consider adopting the Policy at an upcoming meeting and incorporate a public process to ensure both entities capture and incorporate the specific needs of the communities we serve. The Policy can address gaps, like definitions and metrics we need to incorporate environmental justice principles into all we do. Similarly, OPC's 2022 Equity Plan commits to embedding equity across ocean and coastal policies by strengthening environmental justice policies,

expanding meaningful community engagement, providing targeted funding and technical assistance, and integrating community science and tribal expertise into decision-making. Together, these statewide policies provide a strong framework for ensuring that California's marine resource management is inclusive, transparent, and responsive to the needs of historically underserved communities.

CONCLUSION

Integrating equity considerations into the adaptive management of California's MPA network is essential to ensuring that the benefits of conservation are shared fairly across all communities. The history of exclusion from the coast experienced by California Native American tribes and disadvantaged communities underscores the need for representation in decision-making processes and meaningful participation in the stewardship of coastal and marine resources. This initial assessment of Questions 14 and 16 of the 2025 MPA Petition Evaluation Framework provides an initial foundation for how proposed petition actions may influence equitable access and alignment with the CFGC's JEDI Policy, while also highlighting data gaps and the opportunities available to address them.

Moving forward, expanding tribal and community engagement, investing in social, cultural, and access-related research will be critical to deepening the understanding of how different communities experience MPAs and the coast. By centering tribal stewardship and equity, California can continue building more inclusive and resilient ecosystems and ensure all Californians are able to access them in the future.

Appendix A

2023 Bin 2 MPA Petitions Proposed Actions

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
2023-**14**MPA	2023-14MPA_1-9	Sea Lion Cove, Stewart's Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's SMCAs	Modify take in 9 SMCAs to 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.	Point Vicente - CES median 91% SB535 median 68% Overall median 85%	• African American (15,576) • Asian American (40,479) • Hispanic (129,192) • Native American (308) • Other (5,306) • White (21,995)	77%	76%	71%	3	2			1								2				
				Naples - CES 76.8%	• African American (373) • Asian American (658) • Hispanic (2,916) • Native American (0) • Other (103) • White (1,716)	60%	64%	67%																
2023-**18**MPA	2023-18MPA_1	Vandenberg SMR	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.	Campus Point - CES 76.8%	• African American (373) • Asian American (658) • Hispanic (2,916) • Native American (0) • Other (103) • White (1,716)	60%	64%	67%	11	7				2					1		22	4	4		22	

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
2022-004	2022-004	Vandenberg SMR	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	Vandenberg - CES 80.81%	• African American (41) • Asian American (231) • Hispanic (6,845) • Native American (0) • Other (18) • White (438)	92%	84%	78%	3	2	1		2	1					1		2	2			
2023-**18**MPA	2023-18MPA_4	Campus Point SMCA	Change color of No-take Campus Point SMCA from purple to red on maps.	Campus Point - CES 76.8%	• African American (373) • Asian American (658) • Hispanic (2,916) • Native American (0) • Other (103) • White (1,716)	92%	84%	78%	11	7				2				1		22	4	4		22	
2023-**23**MPA_AM1	2023-23MPA_1_AM1, 2023-23MPA_6_AM1, 2023-23MPA_11_AM1	Edward F. Ricketts, Pacific Grove Marine Gardens, and Carmel Bay SMCAs	For diver safety, prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active within: Edward F. Ricketts State Marine Conservation Area [SMCA, (2023-23MPA_1_AM1)], Pacific Grove Marine Gardens SMCA (2023-23MPA_6_AM1) and Carmel Bay	Edward Ricketts - SB535 68%	• African American (391) • Asian American (505) • Hispanic (1,108) • Native American (0) • Other (271) • White (1,044)	50%	No data	72%	14	5			2	12		17	6			10	1	6	5		

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
			SMCA (2023-23MPA_11_AM1).																						
2023-**24**MPA_AM1	2023-24MPA_1_AM1	Laguna Beach No-Take SMCA	Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach, which will require modification of the northern boundary of Dana Point SMCA (modified boundaries as amended).	Laguna Beach - CES median 81% SB535 31.58% Overall median 80%	• African American (2,036) • Asian American (3,596) • Hispanic (5,639) • Native American (0) • Other (578) • White (5,084)	25%	64%	44%	19	25			2	2	1				1	39	24	10	21	32	
2023-**33**MPA_AM1	2023-33MPA_1_AM1	Cabrillo SMR	Expand Cabrillo SMR westward (to 3-mile state line) and northward (to New Hope Rock) by ~9.99 sq mi.	Cabrillo - CES median 84% SB535 median 70% Overall median 83%	• African American (13,970) • Asian American (17,119) • Hispanic (114,397) • Native American (309) • Other (3,453) • White (29,430)	80%	82%	83%	1	1			1							1	1	2			

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
Tribally-led Petitions																									
2023-**28**MPA_AM2	2023-28MPA_1_AM2	N/A (New - Point Sal SMCA)	Designate a new SMCA that is just over 9 sq mi around Point Sal in central California with allowance for recreational take of finfish by hook-and-line from shore; consult with tribes to identify a traditional tribal name for the new MPA; include language to allow for take incidental to mission-critical operations at Vandenberg Space Force Base, discretionally restrict public entry, and require the CDFW to develop a Memorandum of Understanding (MOU) with the Commander of Vandenberg Space Force Base for the mutually beneficial management and administration of the Point Sal SMCA and then work to formalize an	Point Sal - CES Score 81%	• African American (41) • Asian American (231) • Hispanic (6,845) • Native American (0) • Other (18) • White (438)	92%	84%	77%	1																

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
			official collaborative co-stewardship agreement among CDFW, the Northern Chumash Tribal Council and other interested tribes.																						

Appendix B

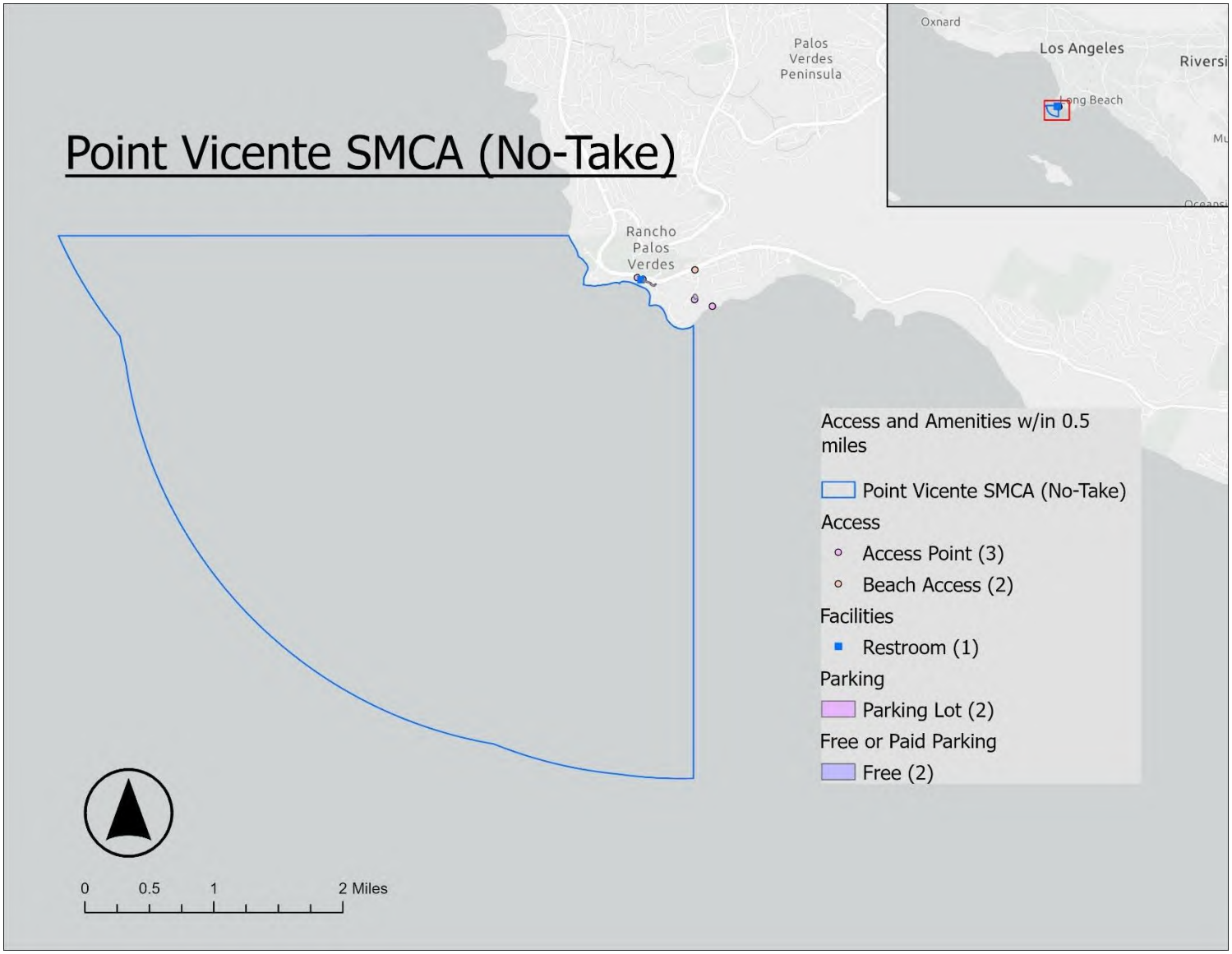


Figure 1 Point Vicente Coastal Access Map

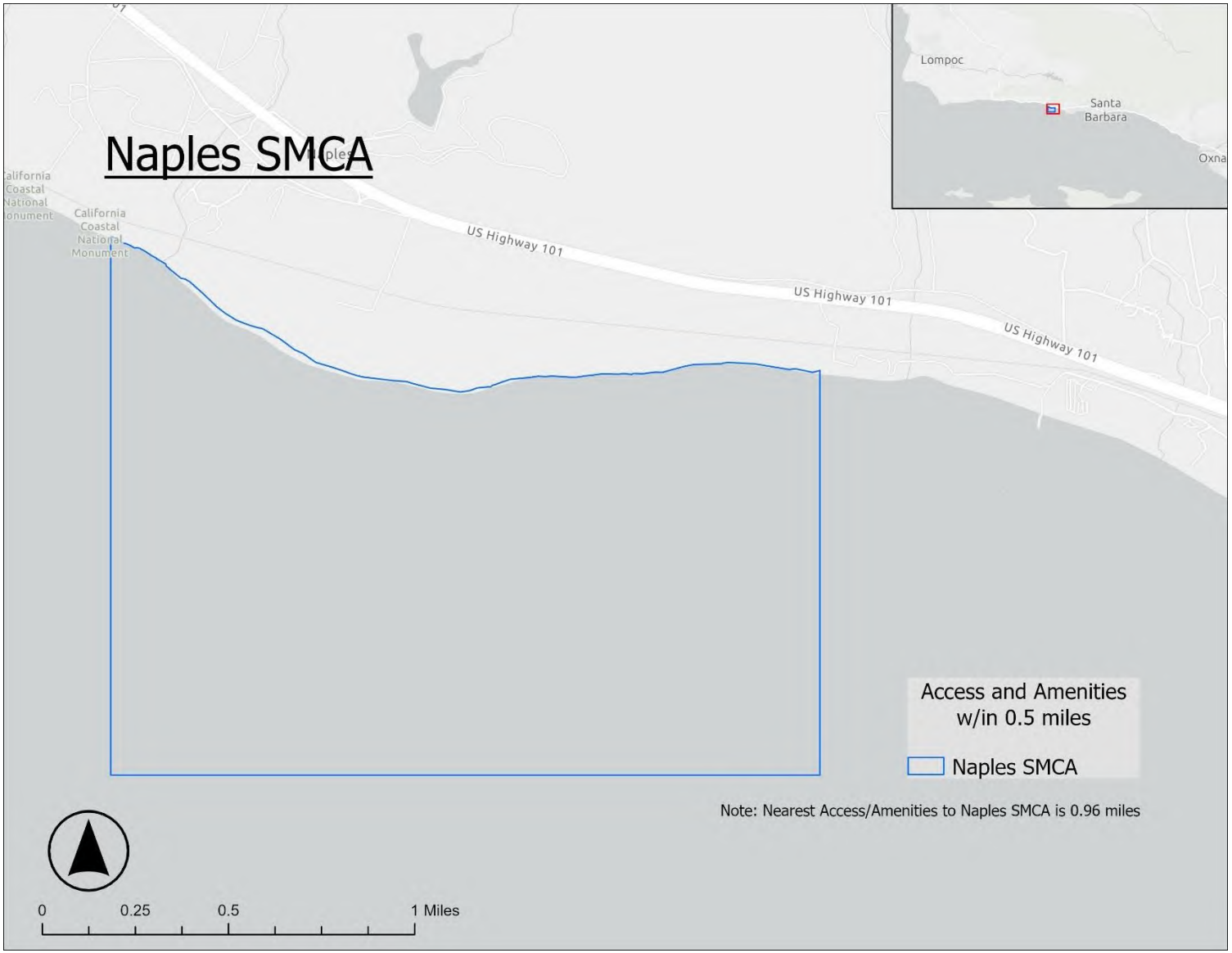


Figure 2 Naples SMCA Coastal Access Map

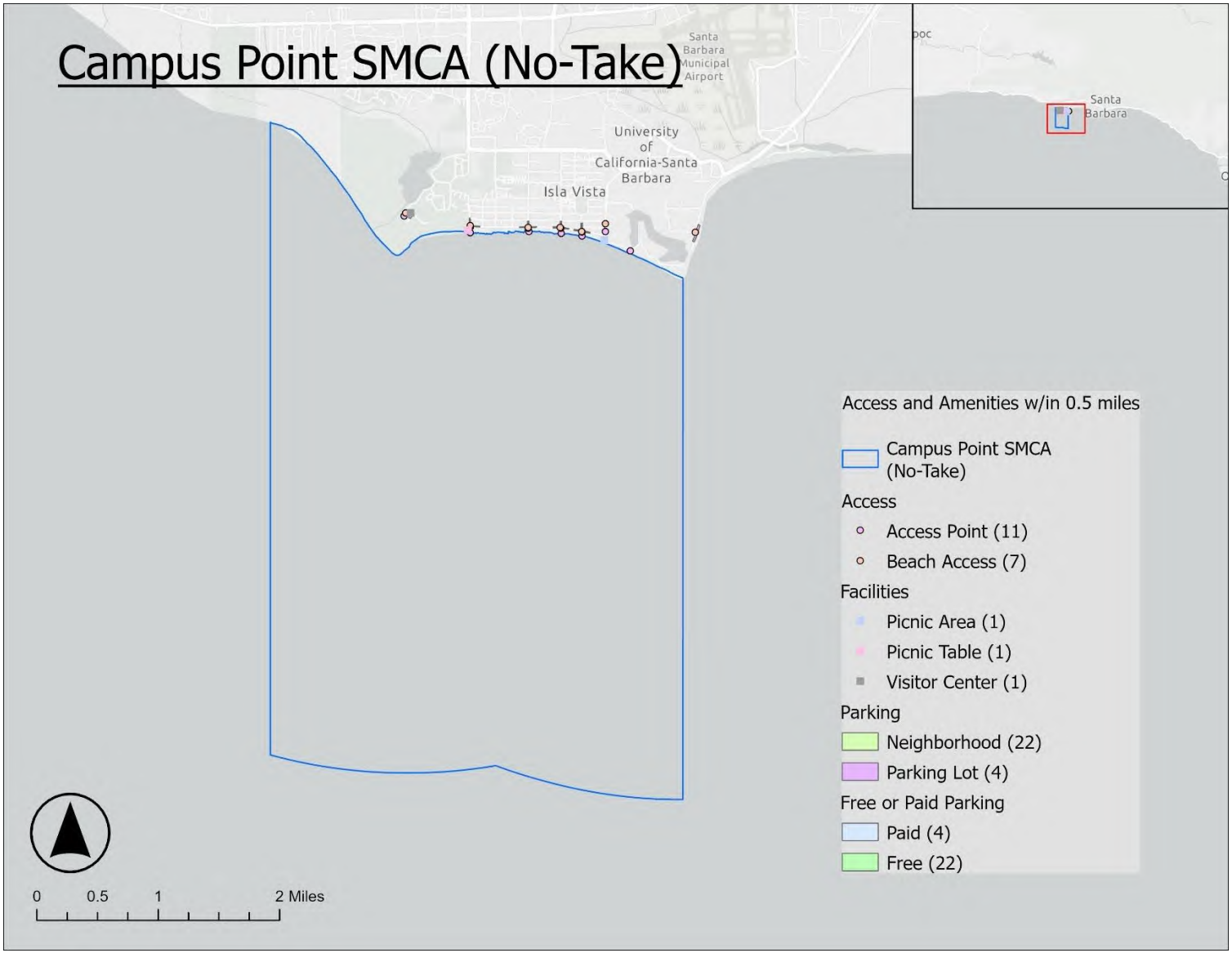


Figure 3 Campus Point SMCA (No-Take) Coastal Access Map

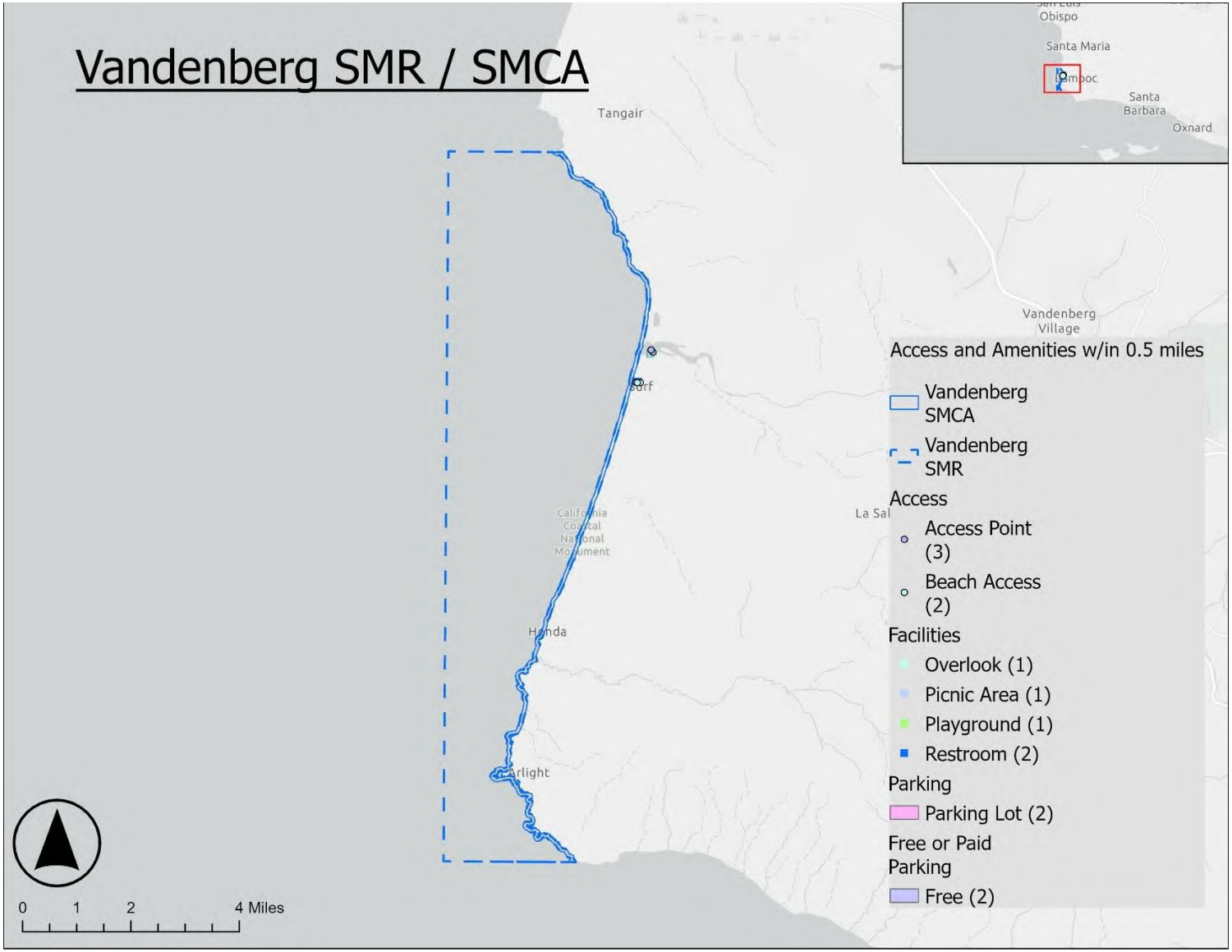


Figure 4 Vandenberg SMR/SMCA Coastal Access Map

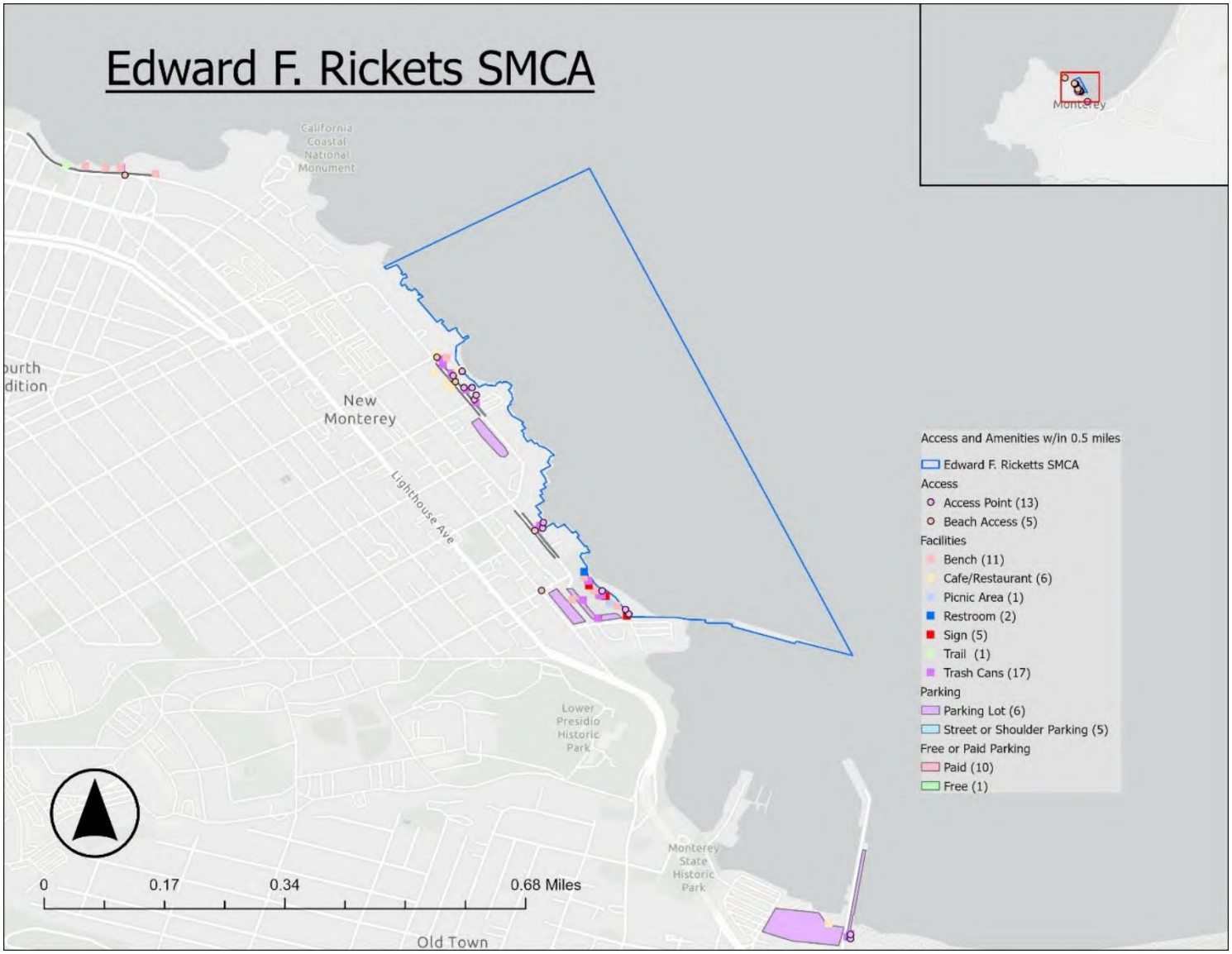


Figure 5 Edward F. Rickets SMCA Coastal Access Map

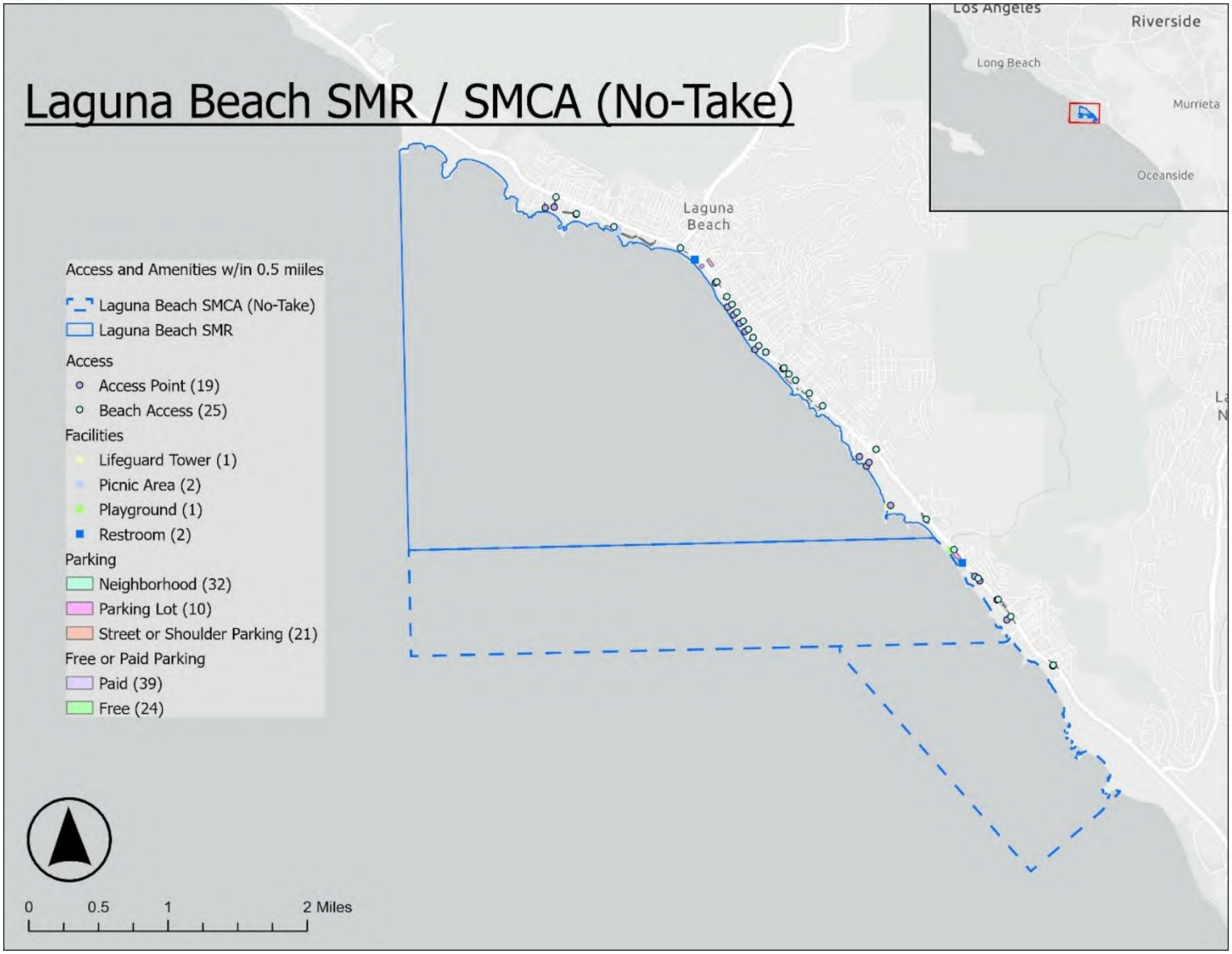


Figure 6 Laguna Beach SMR/SMCA (No-Take) Coastal Access Map



Figure 7 Cabrillo SMR Coastal Access Map

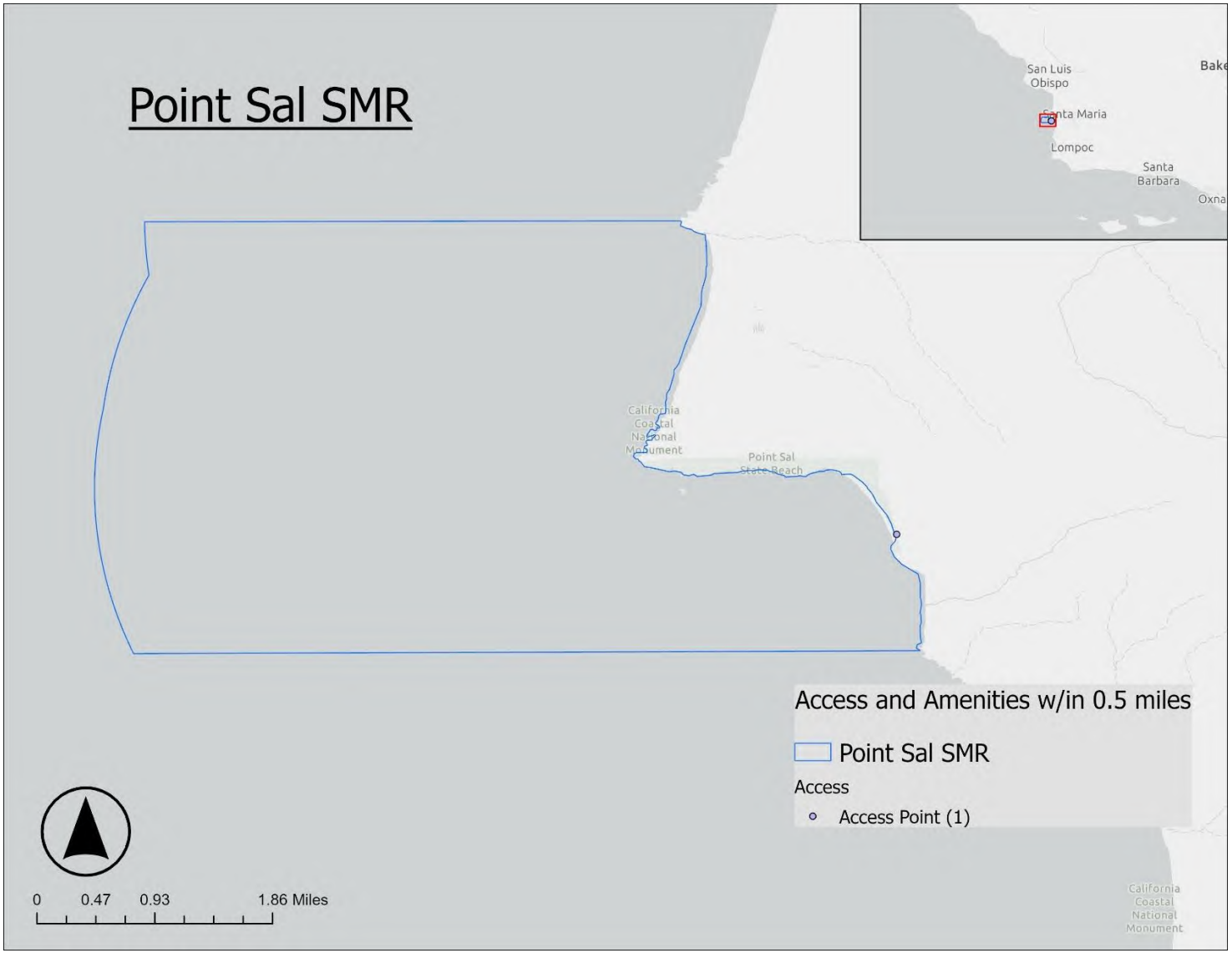


Figure 8 Point Sal SMR Coastal Access Map

Appendix C

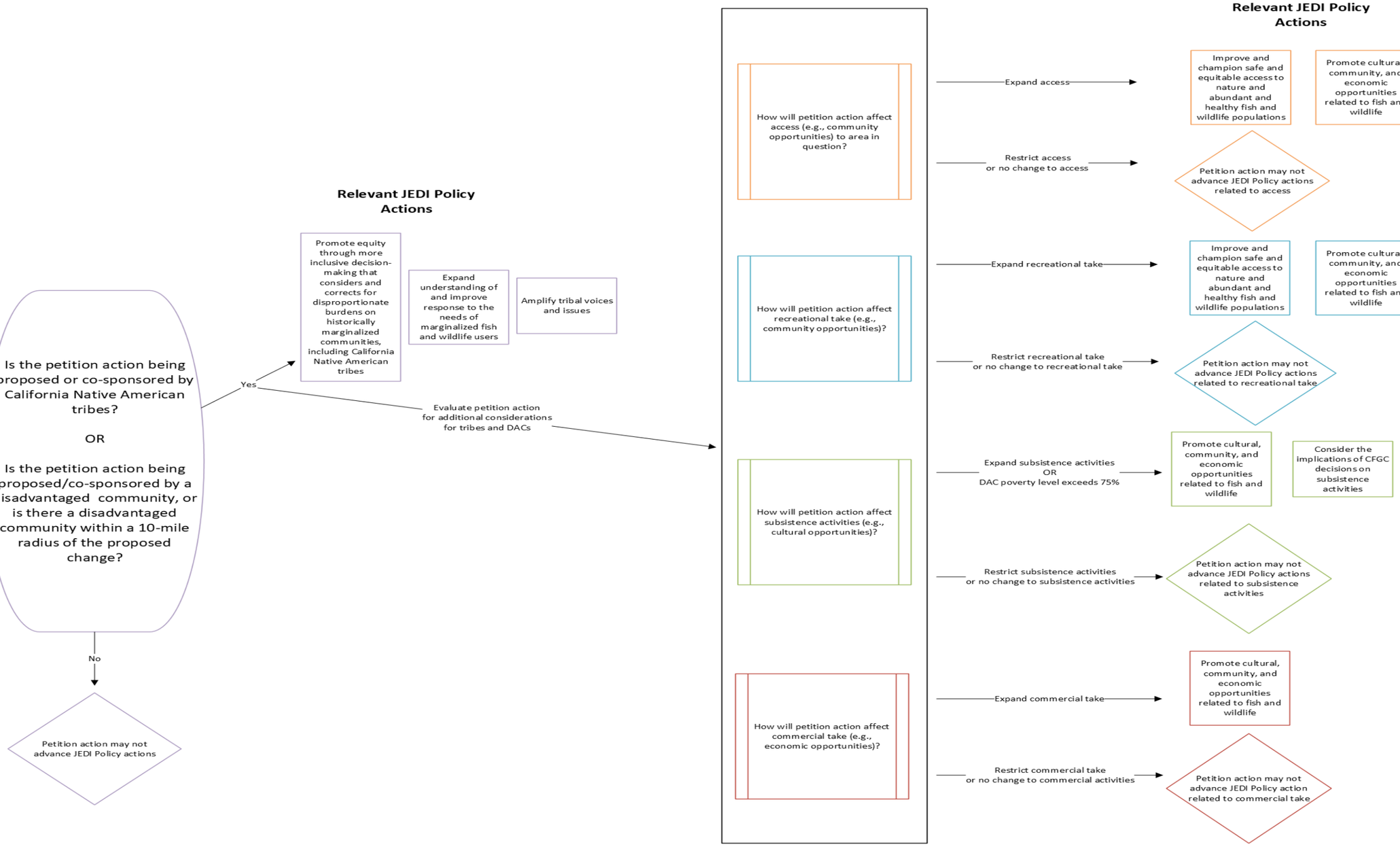


Figure 9 Considerations Flow Chart for JEDI Policy Actions

Appendix D

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**14**MPA	2023-14MPA_5	**Naples SMCA**	Modify	Take	Modify take in 9 SMCAs to 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.	Naples - CES 76.8%	60%	64%	67%	Yes	Yes	No	No	Yes	No
2023-**14**MPA	2023-14MPA_8	**Point Vicente SMCA**	Modify	Take	Modify take in 9 SMCAs to 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.	Point Vicente - CES median 91% SB535 median 68% Overall median 85%	77%	76%	71%	Yes	Yes	No	No	Yes	No
2023-**18**MPA	2023-18MPA_1	**Vandenberg SMR**	Modify	Classification, Take	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.	Campus Point - CES 76.8%	60%	64%	67%	Yes	Yes	No	No	No	No

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2022-004	2022-004	**Vandenberg SMR**	Modify	Classification, Take	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	Vandenberg - CES 80.81%	92%	84%	78%	Yes	Yes	Yes	Yes	Yes	No
2023-**23**MPA_AM1	2023-23MPA_1_AM1	**Edward F. Ricketts**, SMCA	Modify	Classification, Take	For diver safety, prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit" is active within: Edward F. Ricketts State Marine Conservation Area [SMCA, (2023-23MPA_1_AM1)], Pacific Grove Marine Gardens SMCA (2023-23MPA_6_AM1) and Carmel Bay SMCA (2023-23MPA_11_AM1).	Edward Ricketts - SB535 68%	50%	No data	72%	Yes	Yes	No	No	No	No
2023-**23**MPA_AM1	2023-23MPA_2	**Edward F. Ricketts** SMCA	Modify	Take	Allow unlimited recreational urchin removal in Edward F. Ricketts SMCA (2023-23MPA_2), Pacific Grove Marine Gardens SMCA (2023-23MPA_7), Carmel Bay SMCA (2023-23MPA_12), and Point Lobos State Marine Reserve [SMR, (2023-23MPA_16)].	Edward Ricketts - SB535 68%	50%	No data	72%	Yes	Yes	No	No	No	No

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**23**MPA_AM 1	2023-23MPA_3, 4, 5	**Edward F. Ricketts SMCAs**	Modify	Regchange	In Edward F. Ricketts SMCA, Pacific Grove Marine Gardens SMCA, Carmel Bay SMCA, and Point Lobos SMR, allow the following activities to occur without an SCP: • Out-planting kelp on the reef, • Spore dispersal by sporophyte bags, and • Pruning kelp canopy to promote growth and resilience to storms.	Edward Ricketts - SB535 68%	50%	No data	72%	Yes	Yes	No	No	No	No
2023-**24**MPA_AM 1	2023-24MPA_1_AM1	**Laguna Beach No-Take SMCA**	Modify	Boundaries	Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach, which will require modification of the northern boundary of Dana Point SMCA (modified boundaries as amended).	Laguna Beach - CES median 81% SB535 31.58% Overall median 80%	25%	64%	44%	Yes	Yes	No	No	No	No

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**33**MPA_AM1	2023-33MPA_1_AM1	**Cabrillo SMR**	Modify	Boundaries	Expand Cabrillo SMR westward (to 3-mile state line) and northward (to New Hope Rock) by ~9.99 sq mi.	Cabrillo - CES median 84% SB535 median 70% Overall median 83%	80%	82%	83%	Yes	Yes	Yes	No	No	No
Tribally-led Petitions															
2023-**19**MPA-AM1	2023-19MPA_1_AM1	N/A (New - Chitqawi SMCA)	Establish	Establish new MPA	Designate new SMCA in Morro Bay with a tribal take exemption for SYBCI					Yes	Yes	Yes	No	Yes	Yes
2023-20MPA_AM1	2023-20MPA_1	Point Buchon SMCA (maybe SMR too)	N/A	Non-regulatory - tribal	Establish co-management with Santa Ynez Band of Chumash Indians at Point Buchon SMCA.					Yes	Yes	Yes	Yes	Yes	Yes
2023-20MPA_AM1	2023-20MPA_2	Point Buchon SMR	Modify	Boundaries	Adjust the northern boundary of Point Buchon SMR to align with Point Buchon.					Yes	Yes	No	No	No	Yes
2023-20MPA_AM1	2023-20MPA_3	Point Buchon SMCA	Modify	Name	Rename the SMCA					Yes	Yes	No	No	No	Yes
2023-**20**MPA_AM1	2023-20MPA_4_AM1	Point Buchon SMCA	Modify	Take	Add tribal take exemption for Santa Ynez Band of Chumash Indians					Yes	Yes	Yes	Yes	Yes	Yes

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**21**MPA_AM1	2023-21MPA_1	Pyramid Point SMCA	Modify	Take	Remove recreational take allowance for surf smelt by dip net or Hawaiian type throw net in Pyramid Point SMCA so the MPA would become a No-take SMCA and retain the existing tribal exemption for Tolowa Dee-ni' Nation					Yes	Yes	Yes	Yes	Yes	Yes
2023-**21**MPA_AM1	2023-21MPA_2	Pyramid Point SMCA	Modify	Boundaries	Change northern boundary from the official California/Oregon state line (42°N) to align with the landside surveyed border (41°59'55"N)					Yes	Yes	No	No	No	Yes

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**28**MPA_AM2	2023-28MPA_1_AM2	N/A (New - **Point Sal** SMCA)	Establish	Establish new MPA	Designate a new SMCA that is just over 9 sq mi around Point Sal in central California with allowance for recreational take of finfish by hook-and-line from shore; consult with tribes to identify a traditional tribal name for the new MPA; include language to allow for take incidental to mission-critical operations at Vandenberg Space Force Base, discretionally restrict public entry, and require the CDFW to develop a Memorandum of Understanding (MOU) with the Commander of Vandenberg Space Force Base for the mutually beneficial management and administration of the Point Sal SMCA and then work to formalize an official collaborative co-stewardship agreement among CDFW, the Northern Chumash Tribal Council and other interested tribes.	Point Sal - CES Score 81%	92%	84%	77%	Yes	Yes	Yes	Yes	Yes	Yes

						CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	MLPA Action Category	Action Type	Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**29**MPA_AM2	2023-29MPA_1_AM2	N/A (New - Mishopshno SMCA)	Establish	Establish new MPA	Designate a new tribal co-management SMCA (9.05 sq mi) near Carpinteria named Mishopshno that allows for the recreational take of finfish by hook-and-line from shore and a tribal take exemption for Santa Ynez Band of Chumash Indians. Develop a co-management agreement between the State of California and the SYBCI through continued access to the shoreline and marine resources for traditional, ceremonial, cultural, and subsistence purposes for all Chumash people.					Yes	Yes	Yes	Yes	Yes	Yes



INITIAL ASSESSMENT OF Q14/Q16

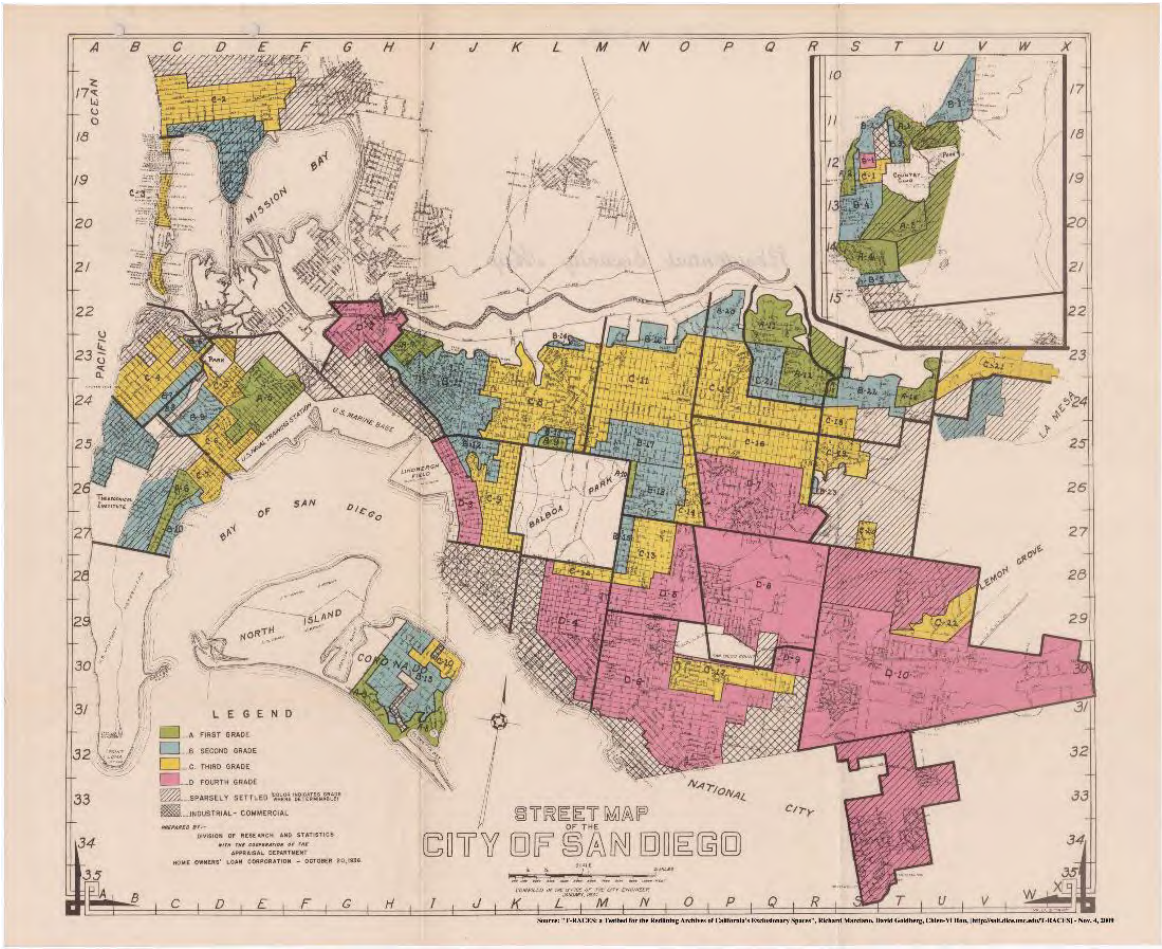
2025 MPA Petition Evaluation Framework

Presented to the California Fish and Game Commission

August 12, 2026

Historic Exclusion from the Coast

- Historic wrongs committed against California Native American tribes by the State of California
- Discriminatory laws, policies, and practices



Approach to Q14 Equitable Access

Does the proposed change provide more equitable access opportunities (e.g., fishing, educational, and/or other recreational opportunities) for traditionally underserved or marginalized communities?



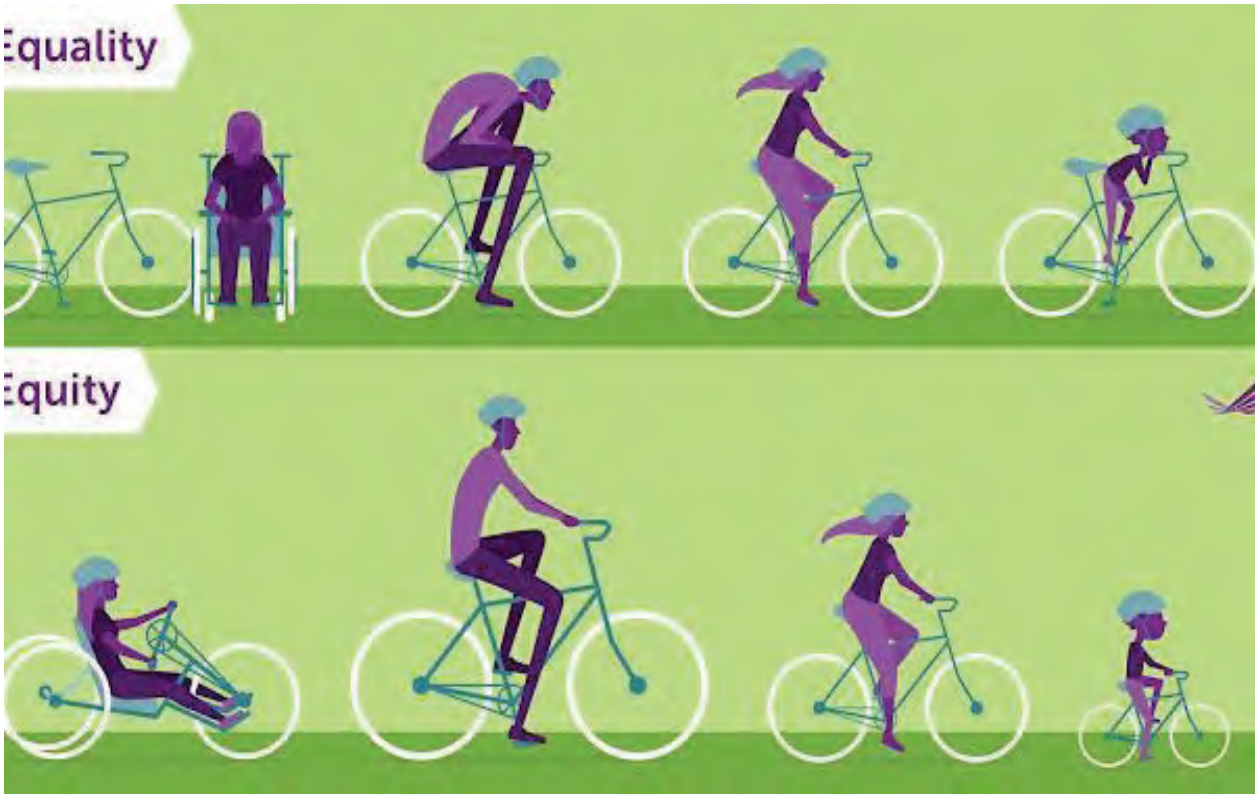
Equity Analysis Considerations for Tribes



Evaluating tribes under the context of racial equity does not provide the level of engagement tribes deserve nor acknowledges their status as the original stewards of the land and ocean.

Defining Terms

- **“Equitable Access”** is defined using the CNRA Outdoors for All Strategy with a racial equity lens
- **“Underserved or marginalized communities”** will use the same definition as “disadvantaged communities” as defined by SB 535



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Equitable Access Inventory

1. Identify disadvantaged communities (>75 percentile) within a 10-mile radius of a proposed change
2. Demographics and socioeconomic information of communities
3. Coastal access points and amenities

CalEnviroScreen 4.0



- Evaluates cumulative environmental and socioeconomic disadvantage at the census tract scale

Mapping Coastal Access and Amenities





Question 14 Inventory

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot

Question 14 Inventory

			CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
2023-14MPA_1-9	Sea Lion Cove, Stewart's Point, Salt Point, Double Cone Rock, Naples, Anacapa Island, Point Dume, Point Vicente, and Swami's SMCAs	Modify take in 9 SMCAs to 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.	Point Vicente - CES median 91% SB535 median 68% Overall median 85%	• African American (15,576) • Asian American (40,479) • Hispanic (129,192) • Native American (308) • Other (5,306) • White (21,995)	77%	76%	71%	3	2			1								2				
			Naples - CES 76.8%	• African American (373) • Asian American (658) • Hispanic (2,916) • Native American (0) • Other (103) • White (1,716)	60%	64%	67%																
2023-18MPA_1	Vandenberg SMR	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.	Campus Point - CES 76.8%	• African American (373) • Asian American (658) • Hispanic (2,916) • Native American (0) • Other (103) • White (1,716)	60%	64%	67%	11	7				2				1		22	4	4		22	

Question 14 Inventory (Tribally-Led/Co-led)

				CES 4.0 DACs (10 mi)					Access Points				Amenities							Parking + Fees					
CFGC Tracking No.	Action ID	Affected MPA	Proposed Action	DAC within 10 miles	Demographics	Educational Attainment	Linguistic Isolation	Poverty	Access Points (trails, paths, stairs, etc.)	Beach	Visual (including overlooks)	Pier	Restroom (showers, portable)	Picnic Area (Benches, Tables, BBQ)	Lifeguard Tower	Trash Cans	Stores (Gift shop, Cafe/Restaurants)	Visitor Center	Other Recreational Amenities (playground, ball park, etc.)	Paid Parking (Lots,Street, etc)	Free Parking (Lots,Street, etc)	Parking Lots	Street Parking	Neighborhood Parking	Unmarked Parking Lot
Tribally-led Petitions																									
2023-**28**MPA_AM2	2023-28MPA_1_AM2	N/A (New - Point Sal SMCA)	Designate a new SMCA that is just over 9 sq mi around Point Sal in central California with allowance for recreational take of finfish by hook-and-line from shore; consult with tribes to identify a traditional tribal name for the new MPA; include language to allow for take incidental to mission-critical operations at Vandenberg Space Force Base, discretionally restrict public entry, and require the CDFW to develop a Memorandum of Understanding (MOU) with the Commander of Vandenberg Space Force Base for the mutually beneficial management and administration of the Point Sal SMCA and then work to formalize an	Point Sal - CES Score 81%	• African American (41) • Asian American (231) • Hispanic (6,845) • Native American (0) • Other (18) • White (438)	92%	84%	77%	1																

Approach to Q16 CFGC's JEDI Policy

Is the proposed change consistent with the CFGC Justice, Equity, Diversity, and Inclusion Policy?



Six Most Relevant Actions within the JEDI Policy

1. Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes
2. Expand understanding of and improve response to the needs of marginalized fish and wildlife users
3. Amplify tribal voices and issues
4. Consider the implications of CFGC decisions on subsistence activities
5. Improve and champion safe and equitable access to nature and abundant and healthy fish and wildlife populations
6. Promote cultural, community, and economic opportunities related to fish and wildlife

Question 16 Inventory

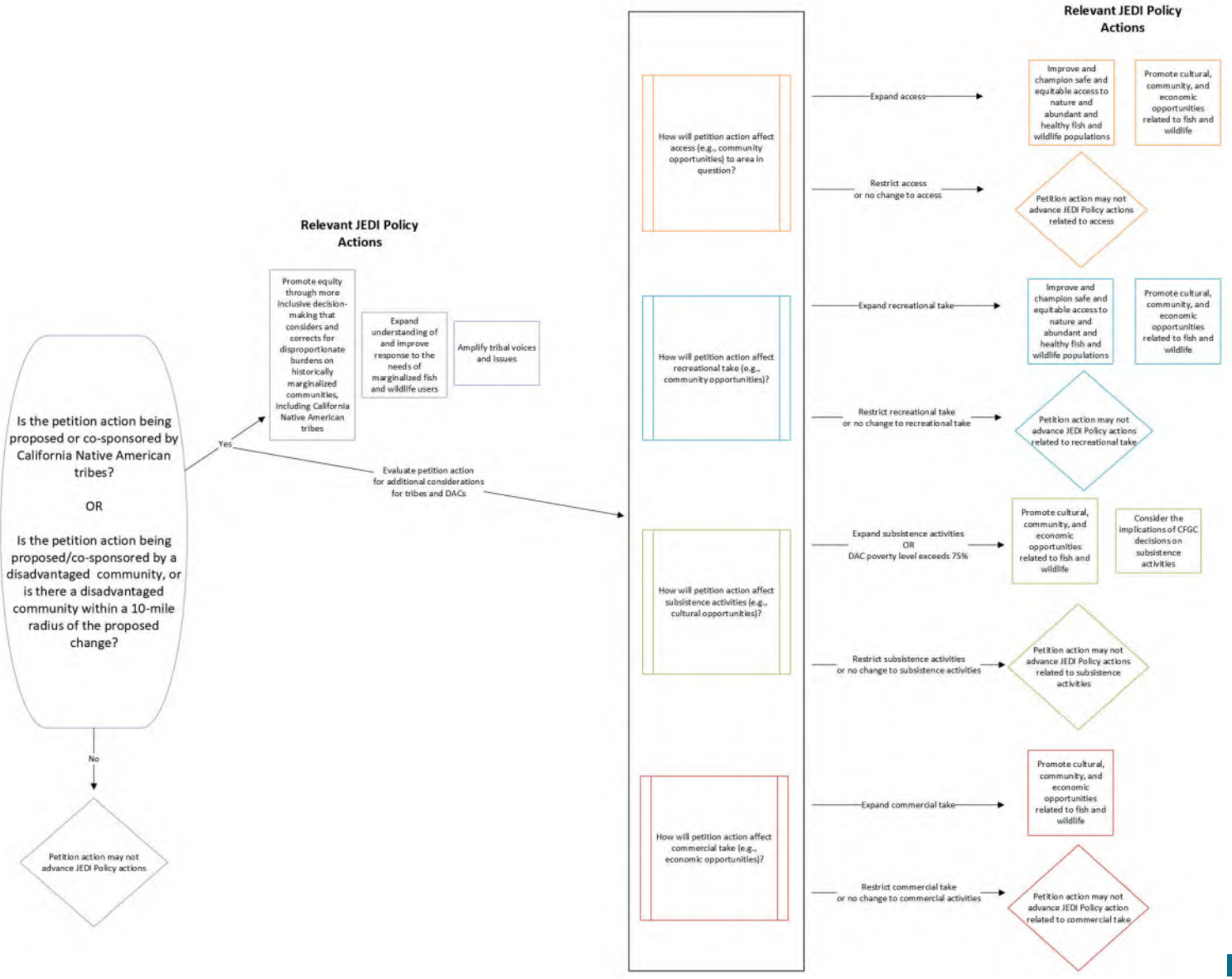
	CES 4.0 Indicators									
Proposed Action	DAC within 10 miles	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues

Question 16 Inventory

					CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	Action Type	Proposed Action	Is there a DAC within 10 miles of the proposed change?	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
2023-**14**MPA	2023-14MPA_5	**Naples SMCA**	Take	Modify take in 9 SMCAs to 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.	Naples – CES 76.8%	60%	64%	67%	*yes*	*yes*	no	no	*yes*	no
2023-**14**MPA	2023-14MPA_8	**Point Vicente SMCA**	Take	Modify take in 9 SMCAs to allow commercial urchin take at Sea Lion Cove, Stewarts Point, Salt	Point Vicente –	77%	76%	71%	*yes*	*yes*	no	no	*yes*	no
2023-**18**MPA	2023-18MPA_1	**Vandenberg SMR**	Classification, Take	Redesignate a portion of Vandenberg State Marine Reserve (SMR) to create a narrow State	Campus Point – CES 76.8%	60%	64%	67%	*yes*	*yes*	no	no	no	no
2022-004	2022-004	**Vandenberg SMR**	Classification, Take	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	Vandenberg – CES 80.81%	92%	84%	78%	*yes*	*yes*	*yes*	*yes*	*yes*	no
2023-**23**MPA_AM1	2023-23MPA_1_AM1	**Edward F. Ricketts**, SMCA	Classification, Take	For diver safety, prohibit recreational and commercial take of finfish when a petitioner-proposed "kelp restoration management permit"	Edward Ricketts – SB535 68%	50%	No data	72%	*yes*	*yes*	no	no	no	no
2023-**23**MPA_AM1	2023-23MPA_2	**Edward F. Ricketts** SMCA	Take	Allow unlimited recreational urchin removal in Edward F. Ricketts SMCA (2023-23MPA_2),	Edward Ricketts – SB535 68%	50%	No data	72%	*yes*	*yes*	no	no	no	no
2023-**23**MPA_AM1	2023-23MPA_3, 4, 5	**Edward F. Ricketts** SMCAs	Reg change	In Edward F. Ricketts SMCA, Pacific Grove Marine Gardens SMCA, Carmel Bay SMCA, and Point Lobos SMR, allow the following activities to occur	Edward Ricketts – SB535 68%	50%	No data	72%	*yes*	*yes*	no	no	no	no
2023-**24**MPA_AM1	2023-24MPA_1_AM1	**Laguna Beach No-Take SMCA**	Boundaries	Extend the Laguna Beach No-take SMCA southern boundary to the southern border of the City of Laguna Beach, which will require	Laguna Beach – CES median	25%	64%	44%	*yes*	*yes*	no	no	no	no
2023-**33**MPA_AM1	2023-33MPA_1_AM1	**Cabrillo SMR**	Boundaries	Expand Cabrillo SMR westward (to 3-mile state line) and northward (to New Hope Rock) by ~3.99 sq mi.	Cabrillo – CES average 84%	80%	82%	83%	*yes*	*yes*	*yes*	no	no	no

Question 16 Inventory (Tribally-led/co-led)

					CES 4.0 Indicators									
CFGC Tracking No.	Action ID	Affected MPA	Action Type	Proposed Action	Is there a DAC within 10 miles of the proposed change?	Educational Attainment	Linguistic Isolation	Poverty	Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes	Expand understanding of and improve response to the needs of marginalized fish and wildlife users	Consider implications of our decisions on subsistence activities	Improve and champion equitable access to nature and abundant and healthy fish and wildlife populations	Promote cultural, community, and economic opportunities related to fish and wildlife	Amplify tribal voices and issues
Tribally-led Petitions														
2023-**19**MPA-AM1	2023-19MPA_1_AM1	N/A (New - Chitqawi SMCA)	Establish new MPA	Designate new SMCA in Morro Bay with a tribal take exemption for SYBCI					yes	yes	yes	no	yes	yes
2023-20MPA_AM1	2023-20MPA_1	Point Buchon SMCA (maybe SMR too)	Non-regulatory - tribal	Establish co-management with Santa Ynez Band of Chumash Indians at Point Buchon SMCA.					yes	yes	yes	yes	yes	yes
2023-20MPA_AM1	2023-20MPA_2	Point Buchon SMR	Boundaries	Adjust the northern boundary of Point Buchon SMR to align with Point Buchon.					yes	yes	no	no	no	yes
2023-20MPA_AM1	2023-20MPA_3	Point Buchon SMCA	Name	Rename the SMCA					yes	yes	no	no	no	yes
2023-**20**MPA_AM1	2023-20MPA_4_AM1	Point Buchon SMCA	Take	Add tribal take exemption for Santa Ynez Band of Chumash Indians					yes	yes	yes	yes	yes	yes
2023-**21**MPA_AM1	2023-21MPA_1	Pyramid Point SMCA	Take	Remove recreational take allowance for surf smelt by dip net or Hawaiian type throw net in Pyramid					yes	yes	yes	yes	yes	yes
2023-**21**MPA_AM1	2023-21MPA_2	Pyramid Point SMCA	Boundaries	Change northern boundary from the official California/Oregon state line (42˚N) to align with					yes	yes	no	no	no	yes
2023-**28**MPA_AM2	2023-28MPA_1_AM2	N/A (New - **Point Sal** SMCA)	Establish new MPA	Designate a new SMCA that is just over 3 sq mi around Point Sal in central California with allowance for recreational take of finfish by hook-and-line from shore; consult with tribes to identify	Point Sal - CES Score 81%	92%	84%	77%	yes	yes	yes	yes	yes	yes
2023-**29**MPA_AM2	2023-29MPA_1_AM2	N/A (New - Mishopshno SMCA)	Establish new MPA	Designate a new tribal co-management SMCA (9.05 sq mi) near Carpinteria named Mishopshno that allows for the recreational take of finfish by hook-and-line from shore and a tribal take					yes	yes	yes	yes	yes	yes


Relevant JEDI Policy Actions
Is the petition action being proposed or co-sponsored by California Native American tribes?
OR
Is the petition action being proposed/co-sponsored by a disadvantaged community, or is there a disadvantaged community within a 10-mile radius of the proposed change?
Yes
No
Promote equity through more inclusive decision-making that considers and corrects for disproportionate burdens on historically marginalized communities, including California Native American tribes
Expand understanding of and improve response to the needs of marginalized fish and wildlife users
Amplify tribal voices and issues
Evaluate petition action for additional considerations for tribes and DACs
Petition action may not advance JEDI Policy actions
Relevant JEDI Policy Actions
How will petition action affect access (e.g., community opportunities) to area in question?
Expand access
Improve and champion safe and equitable access to nature and abundant and healthy fish and wildlife populations
Promote cultural, community, and economic opportunities related to fish and wildlife
Restrict access or no change to access
Petition action may not advance JEDI Policy actions related to access
How will petition action affect recreational take (e.g., community opportunities)?
Expand recreational take
Improve and champion safe and equitable access to nature and abundant and healthy fish and wildlife populations
Promote cultural, community, and economic opportunities related to fish and wildlife
Restrict recreational take or no change to recreational take
Petition action may not advance JEDI Policy actions related to recreational take
How will petition action affect subsistence activities (e.g., cultural opportunities)?
Expand subsistence activities OR DAC poverty level exceeds 75%
Promote cultural, community, and economic opportunities related to fish and wildlife
Consider the implications of CFGC decisions on subsistence activities
Restrict subsistence activities or no change to subsistence activities
Petition action may not advance JEDI Policy actions related to subsistence activities
How will petition action affect commercial take (e.g., economic opportunities)?
Expand commercial take
Promote cultural, community, and economic opportunities related to fish and wildlife
Restrict commercial take or no change to commercial activities
Petition action may not advance JEDI Policy action related to commercial take

Future Opportunities

- Community outreach and engagement
- Current research projects funded by OPC
  - Ocean access and equity project
  - Evaluation of multiple environmental justice screening tools and indicators
- Adopting CNRA's Environmental Justice and Equity Policy



California Fish and Game Commission
October 13-16, 2026 Commission Meeting
General MPA Petition Comments with Brief Descriptions

(Comments received from 12:01 p.m. on August 7, 2026 through 5:00 p.m. on September 30, 2026)

Department = California Department of Fish and Wildlife

SMCA = state marine conservation area; SMR = state marine reserve; MPA = marine protected area

Date Received	Entity/Individual	Description	Number Rec'd
8/12/2026	Eileen Boken	A San Francisco resident suggests that one of the MPA petitions is a follow up to a prior petition urging interim MPA designation for waters off Ocean Beach until they can be incorporated as a non contiguous unit within the Greater Farallones National Marine Sanctuary.	1
8/12/2026	Dave Colker, Executive Director, Ventura County Commercial Fishermen's Association (VCCFA)	VCCFA, in a follow up to their comments at the August 2026 Commission meeting, urges the Commission to fully analyze socioeconomic and spatial displacement impacts before acting on any bin 2 MPA petitions. They emphasize that closures could shift fishing effort into adjacent open areas, affecting ecosystems, working waterfronts, and access to local seafood, and offers industry assistance to ensure these impacts are thoroughly evaluated.	1
8/31/2026	Robert Rutowski	A California resident urges the Commission to approve the California Ocean Protection Council (OPC) recommended proposals — especially the tribally led Point Sal and Mishopshno SMCAs — highlighting their ecological importance, cultural significance, and the opportunity to advance tribal co stewardship for the first time in California's MPA network. They emphasizes that strengthening these protections is essential for climate resilience, biodiversity conservation, and meeting the state's commitment to safeguarding 30 percent of coastal waters by 2030.	1
9/1/2026	Taylor Honrath, Executive Director, Elkhorn Slough Foundation Dan Silver, Executive Director, Endangered Habitats League	Two letters, one from the Elkhorn Slough Foundation and the other from the Endangered Habitats League, urge the Commission to approve all five tribally led and co led MPA petitions and adopt the OPC's recommendations, emphasizing that doing so would strengthen California's MPA network, expand protections, and advance tribal stewardship and co management. They highlight California's leadership in marine conservation and states that expanding these MPAs will improve ecological connectivity while honoring tribal rights and cultural relationships to coastal resources.	2
9/16/2026-9/24/2026	Jennifer Valentine	Sample form letter from California residents urging the Commission to strengthen, rather than weaken, California's MPA network by advancing OPC's recommendations, integrating climate resilience and tribal stewardship, and rejecting petitions that would reduce protections or expand commercial take. They support several targeted MPA expansions and tribal co management proposals, emphasizing that science based conservation and equitable access are essential for sustaining healthy fisheries and coastal communities.	24
9/18/2026	Mike Raabe, Chief Creative Officer, All Waters Protection and Access Coaltion	All Waters Protection & Access Coalition urges the Commission to ensure that any changes to the MPA network follow a transparent, science driven, adaptive management process, cautioning that the OPC's parallel recommendation system departs from the Commission approved evaluation framework and risks setting inconsistent precedent. They ask the Commission to resolve conflicts between the OPC and Department analyses, require clear site specific evidence before imposing new restrictions, and ensure that future decisions maintain scientific rigor, predictability, and public trust.	1
9/22/2026	Joe Huettl	A north coast fisherman from Walnut Creek urges the Commission to deny most proposed MPA expansions, stating that additional closures would further restrict longtime fishing access and disproportionately impact kayak fishermen along the central and north coast. They emphasize that species specific regulations are a more effective and adaptable management tool than expanding no take or highly restrictive MPAs.	1
9/23/2026	Susan Stephenson, Executive Director, California Interfaith Power & Light (CIPL)	CIPL expresses support for OPC's recommendations to advance certain MPA petitions, noting that the recommended approach emphasizes precaution within the adaptive management framework and considers opportunities for Tribal stewardship. It highlights the proposed Mishopshno and Point Sal SMCAs as examples of petitions that would add ecological protections while strengthening Tribal co management, and encourages the Commission to adopt OPC's overall recommendations.	1
9/25/2026	Ashley Eagle-Gibbs, Executive Director, Environmental Action Committee of West Marin (EAC)	EAC expresses support for the OPC recommendations on five tribally led and co led MPA petitions, stating that approving them would strengthen California's MPA network and advance tribal involvement in marine conservation and management. EAC highlights that the proposals would establish or expand protections at several sites, improve boundaries and regulations, and align with recommendations from the Decadal Management Review related to tribal engagement and cultural heritage.	1
9/25 - 9/30/2026	Stephen Tyler	A representative sample of 21 emails received urging the Commission to strengthen the MPA network for climate resilience, equity, and Tribal stewardship, supporting OPC's recommendations and several petitions that expand or enhance protections. They also request denial of petitions that would weaken existing MPAs or introduce new commercial harvest allowances, and supports a modified proposal for Duxbury Reef that protects the intertidal zone while allowing limited recreational fishing.	21
9/26/2026	Fiorenza Micheli and Nur Arafeh Dalmau	Two marine ecologist share an op ed highlighting research indicating that, under certain conditions, well designed MPAs can improve the ability of kelp forests to withstand and recover from marine heatwaves. They encourage the Commission to consider this evidence when evaluating potential changes to the MPA network, noting its relevance to managing kelp ecosystems in a warming ocean.	1
9/27/2026	Wendy Tochihara	Expresses support for science based adaptive management of California's MPA network while opposing petitions that would expand closures without clear ecological justification, emphasizing that the Decadal Management Review found the network to be functioning as intended. They believe that land based water quality issues — such as sewage outfalls, cross border contamination, and sand renourishment — pose greater ecological risks to MPAs than responsible recreational fishing, and recommends prioritizing monitoring, interagency coordination, and equitable access over expanding restrictions.	1

Date Received	Entity/Individual	Description	Number Rec'd
9/27/2026	Mark Fina, Executive Director, California Wetfish Producers Association (CWPA)	CWPA supports the Department's recommendations on the Bin 2 MPA petitions, emphasizing that the Department's evaluations best account for both ecological and socioeconomic considerations and maintain the balance established during the original MPA network design. CWPA expresses concern that several proposed expansions — particularly those affecting soft bottom areas important to the squid fishery — lack sufficient scientific justification, could disrupt operations, and would impose significant economic impacts on fishing fleets, processors, and coastal communities.	1
9/27/2026	Rick Oefinger, President, Marina del Rey Sportfishing, Inc.	Opposes any expansion of MPAs, specifically the Bin 2 proposals affecting Point Dume and Point Vicente, stating that such expansions have already harmed their operations without providing observable ecological benefits. They further stress that longstanding responsible fishing practices — not additional closures — are the appropriate path forward, and that expanded MPAs would only further deprive the public of access to historically productive fishing areas.	1
9/28/2026	Aimee David, Vice President, U.S. & California Ocean Conservation, Monterey Bay Aquarium	Supports only those Bin 2 petitions that would strengthen the MPA network, emphasizing that changes should be grounded in the best available science and the precautionary principle, and that protections should not be weakened without clear evidence of ecological benefit. They further stress that the MPA network is still young, functioning as intended, and needs more time to demonstrate long term outcomes, making it essential for the Commission to maintain or enhance protections rather than diminish them.	1
9/28/2026	Ella Merkle, California Marine Sanctuary Foundation (CMSF)	*Estuaries:* CMSF shares a document outlining the ecological roles of estuaries — such as serving as nursery habitat, buffering coastlines, filtering pollutants, and supporting Tribal cultural resources — and notes they are currently the least protected habitat type in California's MPA network. The analysis identifies gaps in estuarine protection, including limited coverage, wide spacing between sites, and lack of water quality and climate resilience considerations, and describes opportunities to improve the network by protecting entire estuaries, addressing spacing gaps, and incorporating watershed and climate factors into management.	1
9/28/2026	Ella Merkle, California Marine Sanctuary Foundation (CMSF)	*Kelp forests:* CMSF shares a document describing major drivers of kelp forest decline in California — such as marine heatwaves, loss of urchin predators, and resulting increases in urchin populations — and notes that an estimated 90% of the state's kelp has disappeared. It outlines potential management responses across regions, including protecting climate resilient areas within MPAs, maintaining predator communities, improving water quality, and, where appropriate, using active interventions such as targeted urchin removal or reintroducing predators.	1
9/28/2026	Devin O'Dea, Executive Director, Coastal Consevation Association of California (CCA)	Supports the Department's complete petition specific recommendations for the Bin 2 MPA petitions, including all denials and limited approvals, emphasizing that only actions with demonstrated site specific conservation need and clear scientific and socioeconomic justification should advance. They further stress that the most durable and equitable path is for the Commission to adhere strictly to the Master Plan, the Department's technical analyses, and the established adaptive management framework, and to reject petitions that lack sufficient evidence, clarity, or rationale for restricting comparable low impact fishing methods or reducing sustainable recreational access.	1
9/28/2026	Lisa Damrosch, Executive Director, Pacific Coast Federation of Fishermen's Associations (PCFFA)	PCFFA opposes the Bin 2 MPA petitions that would create new or expanded closures, fully aligning with the Department's recommendations to deny such proposals on the grounds that they lack adequate scientific justification, meaningful socioeconomic analysis, and a clear decision making standard. They further emphasize that the current petition process has been inconsistent and insufficiently analytical, urging the Commission to rely on the Department as the state's scientific authority, deny petitions that restrict commercial fishing access without demonstrated need, and pursue Tribal stewardship goals through alternative pathways that do not alter the MPA network.	1
9/29/2026	Anupa Asokan, Fish On, et al.	Fish On summarizes community-informed positions on multiple Bin 2 MPA petitions, grounded in principles of equity, climate resilience, and science. It supports several petitions—particularly those advancing Tribal co management and addressing habitat protection needs—and opposes others that would reduce protections without sufficient scientific justification, while consistently emphasizing the importance of consistent standards, stakeholder inclusion, and adaptive management.	1
9/29/2026	Gary F. Brennan, President, San Diego County Wildlife Federation	The San Diego County Wildlife Federation supports the Department's recommendation to deny the ten non tribal Bin 2 MPA expansion petitions, emphasizing that the petitions present no new science, do not meet the standards of the MPA Master Plan, and would not improve conservation outcomes. They urge the Commission to maintain the existing, science based MLPA network and highlight the cultural, economic, and conservation contributions of recreational anglers. The Federation warns that expanding MPAs would unnecessarily restrict public fishing access without providing measurable benefits to ocean health.	1
9/29/2026	Darren Gertler	Opposes MPA expansion proposals, supporting staff recommendations to deny petitions they believe lack scientific justification and risk undermining California's already strong, science based fisheries management system. They also emphasize that restricting access would weaken opportunities for youth and future generations to connect with and become stewards of their local marine environment.	1
9/29 - 9/30/2026	Various	A representative sample of 45 emails urging the Commission to deny the Bin 2 MPA petitions, consistently emphasizing that the proposals lack scientific justification and contradict the Department's evaluations, which found no ecological benefit from additional closures. The commenters stress that further restrictions would unnecessarily reduce public fishing access, undermine long standing recreational and cultural traditions, and should be rejected in favor of following the Department's science based recommendations.	45
9/29 - 9/30/2026	Kevin Kom	A representative sample of 17 emails received from a campaign supporting the Department's recommendations and to deny the proposed MPA expansions, expressing confidence in the Department's science based review process and endorsing its conclusions.	17
9/30/2026	Kaspar Kazazian, California Surf Fishing	Commenter believes the 2009 science advisory team's moderate low level of protection rating for shore fishing is outdated, noting that newer California Collaborative Fisheries Research Program (CCFRP) catch data show shore only SMCAs performing as well as—or better than—fully protected SMRs. They urge the Commission to consider updated science showing that shore only (or catch and release) SMCAs can provide high levels of ecological protection while supporting equitable public access and sustaining the many businesses and communities that depend on shore fishing.	1

Date Received	Entity/Individual	Description	Number Rec'd
9/30/2026	Current and Former California Coastal Commission Chairs and Members	Supports OPC's science based recommendations, which include strengthening the MPA network and endorsing only those Bin 2 petitions that are backed by clear evidence and align with the state's adaptive management framework. They emphasize California's long standing, coordinated, and science driven approach to ocean management, urging the Commission to adopt OPC's balanced recommendations as an essential step in maintaining a strong, resilient, and well integrated coastal management system.	1
9/30/2026	Sandy Aylesworth, Director, Pacific Initiative, NRDC; Anupa Asokan, Founder and Executive Director, Fish On; et al.	An group of 7 environmental non-governmental organizations and a shore fishing and conservation organization support the OPC recommended Bin 2 petitions, urging the Commission to strengthen the MPA network now rather than wait another decade, stating that adaptive management requires action in the face of accelerating climate change, declining ocean conditions, and increasing human pressures. They further emphasize that several petitions align directly with priority actions identified in the Decadal Management Review, including advancing Tribal engagement, enhancing biodiversity and climate resilience, and preparing the network for large scale ecological stressors; thus, they believe inaction or minimal adjustments would fall short of the MLPA's intent and the urgency of current environmental challenges.	1
9/30/2026	Dr. Will White, Ph.D., Researcher	A marine ecologist involved in multiple scientific assessments of California's MPA network, provides research based context rather than supporting or opposing specific petitions. They highlight three findings: (1) MPA ecological benefits take decades to build but can be quickly lost if protections are removed; (2) older MPAs in southern California have shown resilience to marine heatwaves due to healthy predator populations; and (3) while the MPA network meets minimum connectivity thresholds, additional sites could strengthen resilience, especially under climate change.	1
9/30/2026	Jimmy Hendricks	Supports the Department's recommendations on the Bin 2 MPA petitions and urges the Commission to adopt them in full, emphasizing that the evaluation framework was developed collaboratively, transparently, and with stakeholder agreement. They state that altering the process now — particularly in response to OPC intervention — would undermine public trust, disregard the established science based framework, and jeopardize meaningful public access for recreational anglers.	1
9/30/2026	American Sportfishing Association (ASA)	ASA urges the Commission to adopt the Department's recommendations on Bin 2 MPA petitions, stating that diverging from the agency's scientific review and the Commission's established evaluation framework could undermine public trust in the process. ASA also highlights gaps in socioeconomic analysis, encourages engagement with communities that could be affected by access restrictions, and expresses ASA's willingness to collaborate on biodiversity, restoration, Tribal stewardship, and maintaining sustainable, accessible fisheries.	1
9/30/2026	Wayne Kotow	They support the Department's recommendations and therefore oppose approval of the Bin 2 MPA petitions, emphasizing that decisions must be grounded in sound scientific rationale and adhere strictly to the established review process. They further caution the Commission that adopting unsupported petitions would erode trust in the process and they urge closure of the Decadal Management Review process so focus can return to broader fisheries and ecosystem management priorities.	1
9/30/2026	Brian Wooley	A longtime commercial passenger fishing vessel captain, urges the Commission to adopt Department's recommendations on the non-tribal Bin 2 MPA petitions, including the proposal affecting the Laguna Beach SMCA. He affirms that Department's review found that the petition did not demonstrate a conservation benefit sufficient to justify additional restrictions and recommends maintaining public access while relying on targeted management tools such as enforcement, education, and harvest regulations.	1
9/30/2026	Pete Halmay, President, San Diego Fishermen's Working Group (SDFWG) and Alan Alward, Co-Chair, Alliance of Communities for Sustainable Fisheries (ACSF)	SDFWG and ACSF oppose the Bin 2 MPA petitions and support the Department's recommendation to deny all proposals that would create new or more restrictive MPAs, stating that the scientific evidence does not justify additional closures and that the current petition process lacks adequate scientific rigor, socioeconomic analysis, and transparency. They further contend that MPAs have not demonstrated meaningful ecological benefits at the regional scale, that claims of improved biodiversity or resilience are overstated or unsupported, and that any tribal requests should be handled through name changes or state marine cultural preservation areas rather than new MPAs, ensuring continued fishing access and safeguarding the viability of California's commercial fishing communities.	1
9/30/2026	Dave Colker Executive Director Ventura County Commercial Fishermen's Association (VCCFA)	VCCFA opposes approval of any Bin 2 petitions that would expand MPAs or otherwise reduce fishing access, stating that the petition process lacks the meaningful socioeconomic, spatial displacement, and ecological analysis necessary to evaluate foreseeable consequences for California's commercial fishing grounds, working waterfronts, and statewide seafood production. They further stress that petitioners — not fishermen or agencies — should bear the burden of providing this information, that incomplete records should result in denial or deferral, and that the Commission must ensure future adaptive management decisions incorporate rigorous analysis of displacement, cumulative pressures, and economic impacts before modifying the MPA network.	1
9/30/2026	Douglas Imperato	Urges the state to reject additional MPA closures in the Santa Barbara Channel, stating that existing restrictions are already extensive and that further limits would harm longstanding recreational and commercial fishing communities without proven conservation benefit. They emphasize the need for clear, site specific scientific evidence demonstrating that new closures are necessary and would yield measurable improvements, and stresses that fishermen's local ecological knowledge should be meaningfully incorporated into decision making to ensure balanced, science based management.	1
09/30/206	Mike Conroy, President, Sportfishing Association of California (SAC)	SAC asks the Commission to deny all MPA petitions that both the Department and OPC recommend denying and to follow the Department's science based recommendations where the two agency's recommendations differ. SAC emphasizes the need to fully consider socioeconomic and community impacts — particularly on small businesses, reliant coastal economies, and disadvantaged or low income communities — and shares preliminary passenger origin data suggesting that a large percentage of commercial passenger fishing vessel (CPFV) users come from disadvantaged communities (as identified by CalEnviroScreen) that could be disproportionately affected by reduced fishing access.	1

Outlook

Marine Protected Areas (MPA) Petitions

From aeboken
Date Wed 08/12/2026 06:57 PM
To FGC <FGC@fgc.ca.gov>; Deborah Murphy [redacted] Charles Head [redacted]

TO: California Fish and Game Commission

FR: Eileen Boken,
State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods*

*For identification purposes only

RE: Marine Protected Areas Petition

The Coalition for San Francisco Neighborhoods (CSFN) has previously submitted a Marine Protected Areas (MPA) petition to the California Ocean Protection Council (OPC).

The OPC petition was advocating for the waters off San Francisco's Ocean Beach to be designated as a Marine Protected Area on an interim basis until such time as the waters off San Francisco's Ocean Beach are designed as a non-contiguous area in the Greater Farallones National Marine Sanctuary.

This California Fish and Game Commission MPA petition is a follow up to the Coalition for San Francisco Neighborhoods MPA petition to the California Ocean Protection Council.

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Sent from my Verizon, Samsung Galaxy smartphone

Outlook

Follow-Up Request Regarding Socioeconomic and Spatial Displacement Analysis — Bin 2 MPA Petitions

From VENTURA COUNTY COMMERCIAL FISHERMEN'S ASSOCIATION <venturacountyfishermen@gmail.com>
Date Wed 08/12/2026 04:37 PM
To FGC <FGC@fgc.ca.gov>

Hello Commissioners,

Dave Colker, Executive DIrector Ventura County Commercial FIshermen's Association (VCCFA).

I provided public comment during your August 12 meeting on Item 7, following up on concerns I have raised previously regarding the lack of meaningful **socioeconomic and spatial displacement analysis** associated with several of the current MPA petitions.

I mentioned that I would follow up with an email: And here you go.

I would like to formally request that the following two questions be answered as completely as possible **for each Bin 2 petition before any final decisions are made:**

1. How will this proposal affect the open fishing areas immediately adjacent to the proposed MPA changes?
Where will displaced fishing effort go, and what impacts could that increased pressure have on those areas, their ecosystems, and the Fishermen who fish there? Where will the Fishermen who fish those (proposed closed) areas go?

2. What are the socioeconomic impacts on our working waterfronts and coastal communities?
This should include impacts to commercial fishermen, fuel docks, packing houses, processors, buyers, other support businesses, and ultimately the public's access to locally harvested wild-caught seafood.

I appreciated Commissioner Samantha Murray's discussion with Secretary Wade Crowfoot at the begining of the meeting: regarding the need for funding for additional data and analysis. I believe these two questions are strong candidates for that investment.

Several petitions affecting the Ventura County and Northern Channel Islands fishing grounds have clear potential for both socioeconomic impacts and spatial displacement. In the absence of complete analysis within the petitions themselves, I would like to formally offer the assistance of the Ventura County Commercial Fishermen's Association.

Our commercial fishermen can provide firsthand information about fishing grounds, displacement, where effort is likely to move, and the potential consequences for remaining open areas. We can also

help connect the Commission with local fuel docks, processors, buyers, packing houses, and other working-waterfront businesses that may be affected by additional closures.

I believe one of the most important questions is **what happens to the remaining open areas as additional areas are closed.** Understanding that displacement is important not only for fishermen and coastal communities, but also for evaluating the potential ecological consequences of concentrating fishing effort elsewhere.

Please let me know what information we can provide as you continue evaluating these petitions. We all share the goal of maintaining the strongest and healthiest marine ecosystem possible, and VCCFA is available to assist in developing a more complete understanding of the potential impacts before final decisions are made.

Thank you for your consideration. Please feel free to reach out at any time.

Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)
(805) 663-2152
venturacountyfishermen@gmail.com

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Dave Colker,
Executive Director
Ventura County Commercial Fishermen's Association
805-663-2152

Outlook

Strengthening California's Marine Protected Area Network and Supporting Tribal Co-Stewardship

From Robert Rutkowski
Date Mon 08/31/2026 01:37 PM
To FGC <FGC@fgc.ca.gov>

August 31, 2026

Charlton (Chuck) Bonham
Executive Director
California Fish and Game Commission

Re: Strengthening California's Marine Protected Area Network and Supporting Tribal Co-Stewardship

Dear Mr. Bonham:

I am writing regarding the California Fish and Game Commission's forthcoming consideration of proposals to modify California's marine protected area (MPA) network. The Commission's October 15–16 decisions represent an important opportunity to strengthen the health and resilience of California's coastal waters and to advance the State's commitment to meaningful Tribal co-stewardship.

Among the areas before the Commission is Point Sal, one of California's healthiest remaining coastal landscapes. Its waters support migrating humpback and gray whales, seabirds, sea lions, sea otters, kelp forests, and important habitat for larval fish and invertebrates. Point Sal also lies within the ancestral homeland of the Chumash people and encompasses waters of profound cultural significance.

The importance of the Commission's decision is underscored by the differing recommendations of the California Ocean Protection Council (OPC) and the California Department of Fish and Wildlife (CDFW). The OPC has recommended establishing or strengthening several MPAs, including the Point Sal and Mishopshno proposals, while CDFW has recommended approval of only a limited number of the conservation proposals.

The proposed Mishopshno State Marine Conservation Area and Point Sal State Marine Conservation Area are particularly significant. The Mishopshno proposal would protect a portion of a nearshore rocky reef supporting one of the Central Coast's persistent kelp forests as well as habitat associated with juvenile white sharks. The Point Sal proposal would conserve productive waters surrounding the Point Sal headland, including areas containing sacred Chumash cultural resources.

These proposals also present an important opportunity to address a significant gap in California's existing MPA network. Although the State has 124 MPAs, none is currently Tribally co-managed.

Moreover, this is the first time California Tribes have proposed additions to the MPA network. Approving these proposals would therefore provide a concrete opportunity to advance Tribal participation and co-stewardship in California's marine environment.

This opportunity is consistent with California's broader commitments. The Marine Life Protection Act established the State's MPA network as an ecologically connected system and requires periodic adaptive management. California is now engaged in its first adaptive management process, providing the Commission with an opportunity to respond proactively to changing ocean conditions, the loss of kelp, increasing ocean uses, unprecedented warming, and increasingly frequent and intense marine heat waves.

California has also committed to conserving 30 percent of its coastal waters by 2030. In addition, Governor Gavin Newsom has taken steps to advance ancestral land return and Tribal co-stewardship. The Tribally led MPA proposals provide a direct opportunity to translate those commitments into meaningful action in California's coastal waters.

Marine protected areas can help restore depleted populations, conserve genetic diversity, maintain food webs, and sustain larger wildlife populations. Scientific evidence from MPAs around the world further indicates that healthy protected ecosystems can be better positioned to withstand climate-related shocks and recover from them.

The stakes are particularly high given the increasing pressures confronting California's ocean, including climate change, industrial uses of ocean waters, increased shipping, and the potential expansion of offshore oil development in federal waters. California has historically provided national and international leadership in ocean conservation. The present moment provides an opportunity for the State to maintain that leadership rather than allow existing protections to weaken.

I therefore respectfully urge the California Fish and Game Commission to give full and careful consideration to the recommendations of the Ocean Protection Council and, at a minimum, approve the OPC-recommended conservation proposals, including the Point Sal and Mishopshno State Marine Conservation Areas.

Such action would strengthen California's MPA network, protect important and increasingly vulnerable marine habitats, improve the resilience of coastal ecosystems, and create meaningful opportunities for Tribal co-stewardship in ancestral waters. It would also be consistent with California's stated commitments to ocean conservation and the protection of 30 percent of its coastal waters by 2030.

The Commission's decisions this October will shape the future of California's coastal waters for years to come. I respectfully encourage the Commission to use this opportunity to safeguard these important ecosystems and to affirm California's commitment to responsible, science-informed, and inclusive ocean stewardship.

Thank you for your consideration of this important matter.

Respectfully,

Robert Rutkowski

[redacted]

September 1, 2026

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

Subject: Support to Strengthen and Expand California's Marine Protected Area Network

Dear President Sklar and Commissioners:

On behalf of Elkhorn Slough Foundation, I am writing to support the Ocean Protection Council's recommendations regarding the five Tribally led and co-led Marine Protected Area (MPA) petitions included in the California Fish and Game Commission's August 11, 2026, Tribal Committee meeting materials. We urge the Commission to approve these petitions and continue strengthening and increasing the size of California's MPA Network.

California has long been a global leader in marine conservation. Approving these petitions would build on that leadership by establishing new MPAs, expanding existing protections, improving MPA boundaries and regulations, and strengthening Tribal stewardship of California's coast and ocean.

We support the petitions led or co-led by the Santa Ynez Band of Chumash Indians, Tolowa Dee-ni' Nation, and Northern Chumash Tribal Council. Together, the petitions would establish new protections at Chitqawi in Morro Bay, Point Sal, and Mishopshno off Carpinteria; expand protections at Point Buchon; and update protections at Pyramid Point. Approving these petitions would recognize Tribal take rights while advancing Tribal stewardship and co-management of California's marine resources.

These petitions have been shaped through CDFW evaluation and direct engagement with the Tribes leading or co-leading them. As OPC's recommendations recognize, advancing the petitions would support California's commitments to government-to-government relationships and Tribal stewardship. It would also advance key recommendations from the MPA Decadal Management Review, including improving Tribal engagement, creating a clear pathway to Tribal MPA management, and better incorporating marine cultural heritage into the MPA Network.

We respectfully encourage the Commission to follow OPC's recommendations, approve these petitions, and continue increasing the size, connectivity, and effectiveness of California's MPA Network. **Taking these actions would advance Tribal stewardship and help California continue to be a global conservation leader.**

Thank you for your consideration and continued leadership in protecting California's coast for current and future generations.

Sincerely,

Taylor Honrath
Executive Director
Elkhorn Slough Foundation

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYTEM PROTECTION AND SUSTAINABLE LAND USE

Sept. 1, 2026

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

RE: Item 3, Aug 11, 2026, Five Tribally Led and Co-Led Marine Protected Area (MPA) Petitions – Support to Strengthen and Expand California's Marine Protected Area Network

Dear President Sklar and Commissioners:

Endangered Habitats League supports the Ocean Protection Council's recommendations regarding the five Tribally led and co-led Marine Protected Area (MPA) petitions included in the California Fish and Game Commission's August 11, 2026, Tribal Committee meeting materials. We urge the Commission to approve these petitions and continue strengthening and increasing the size of California's MPA Network.

California has long been a global leader in marine conservation. Approving these petitions would build on that leadership by establishing new MPAs, expanding existing protections, improving MPA boundaries and regulations, and strengthening Tribal stewardship of California's coast and ocean.

We support the petitions led or co-led by the Santa Ynez Band of Chumash Indians, Tolowa Dee-ni' Nation, and Northern Chumash Tribal Council. Together, the petitions would establish new protections at Chitqawi in Morro Bay, Point Sal, and Mishopshno off Carpinteria; expand protections at Point Buchon; and update protections at Pyramid Point. Approving these petitions would recognize Tribal take rights while advancing Tribal stewardship and co-management of California's marine resources.

These petitions have been shaped through CDFW evaluation and direct engagement with the Tribes leading or co-leading them. As OPC's recommendations recognize, advancing the petitions would support California's commitments to government-to-government relationships and Tribal stewardship. It would also advance key recommendations from the MPA Decadal Management Review, including improving Tribal engagement, creating a clear pathway to Tribal MPA management, and better incorporating marine cultural heritage into the MPA Network.

We respectfully encourage the Commission to <u>follow OPC's recommendations, approve these petitions, and continue increasing the size, connectivity, and effectiveness of California's MPA Network</u>.

Thank you for your consideration.

Yours truly,



Dan Silver
Executive Director

Outlook

A Stronger MPA Network for Better Fishing

From Jennifer Valentine
Date Fri 09/18/2026 07:50 PM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

Thank you for the opportunity to comment and for taking time to hear the perspectives of constituents from across the state. As someone who enjoys fishing along the California coast, I urge you to consider updates to the Marine Protected Area Network that will bolster the health of our fisheries for generations to come.

General Comments

This is a critical opportunity for you to help ocean-going communities and ensure that the ecosystems along our coast can withstand and recover from heatwaves and other imminent threats. Many of us in the fishing community believe science-based approaches to conservation are necessary to restore the abundance of our fisheries. We hope you will use MPA adaptive management to consider the needs of communities that are often left out of your decisions, including many of us in the fishing community and other ocean users.

Climate change was not explicitly considered in the design of the current MPA Network and—like equity and environmental justice—was supposed to be a key component of the Department's evaluation of the MPA petitions but was largely ignored. Given that MPAs were shown to be more resilient to the stresses of the last decade, such as the marine heatwave, I urge you to enhance the Network to protect species and biodiversity as an insurance policy for future uncertainties. You have a critical and timely opportunity to make sure our MPAs can keep us fishing beyond the new marine heatwave and pending El Niño. Actions to strengthen the MPA Network for climate resilience will also support more equitable use and recreation for future generations of anglers and spearfishers.

Climate change has also added uncertainty to the little that we do know about our vast and dynamic ocean. MPAs are a living laboratory that can help us understand how marine ecosystems function, and how they are impacted by climate change. This enhanced knowledge supports better fishery management and can help us continue to adapt the MPA Network to better serve all Californians into the future.

The Network should also be seen as an opportunity to reconnect California's Indigenous communities with their native waters, restore Tribal stewardship, and better understand how to incorporate Traditional Ecological Knowledge into MPA management and decision-making. Many communities, including Tribes, conservation-minded fishers, and others who enjoy the ocean, were not considered when the MPAs were designated. These communities should be prioritized in your decision-making process this time around in order to advance equitable access to the ocean and fisheries. MPAs should be used as a tool to repair—not reinforce—imbalances in our fishery management system.

At a minimum, please advance the Ocean Protection Council's recommendations, and keep the integrity of the current MPA Network by rejecting petitions that would weaken existing protections in favor of commercial interests, particularly in our State Marine Reserves.

Other regional and site specific input is below:

North Coast

- *Petition 2023-21MPA: Request to modify **Pyramid Point** SMCA to remove recreational take of surf smelt, and continue current tribal take exemption for Tolowa Dee ni' Nation.*

Please advance the requests of the Tolowa Dee ni' Nation.

- *Petition 2023-14MPA: Request to allow commercial take of sea urchins in nine MPAs including **Double Cone Rock** SMCA, **Sea Lion Cove** SMCA, **Salt Point** SMCA and **Stewart's Point** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

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

Please deny this petition to weaken the MPA Network. California's commercial salmon fishery has just reopened from a three-year closure, making this a time for caution and recovery, not new fishing pressure in fully protected reserves. Moreover, the petition 1) lacks evidence showing harm to the industry, 2) has misappropriated the principles of justice, equity, diversity and inclusion for commercial interests, 3) ignores unavoidable bycatch impacts, and 4) risks weakening the few effective State Marine Reserves which are integral climate refugia and the backbone of our MPA Network.

- *Petition 2023-32MPA: Expand **Duxbury Reef** SMCA to protect the intertidal zone and allow limited recreational fishing.*

Please advance the modified proposal to protect the intertidal areas of Duxbury Reef. There's value to so many communities in protecting the full extent of Duxbury Reef's sensitive and biodiverse habitat, and I believe that additional protection for the more sensitive intertidal zone while still allowing some recreational fishing is a practical compromise.

- *Petition 2023-33MPA_AM1: Request to expand the boundaries of **Natural Bridges** SMR and designate a new SMCA off **Pleasure Point**, in Santa Cruz County.*

Shore-based use is already restricted at Natural Bridges, so I support expanding this reserve to a meaningful size which will make it more consistent with science-based guidelines on effective MPA sizing. Over time, this expansion would enhance nearby recreational fishing, with little to no short-term harm to marginalized fishing communities.

At Pleasure Point, I appreciate the petitioners' amendments to allow some recreational fishing and support the petition as amended. The law that established our MPA Network allows us to take risks, and understand what may work or not work for different communities while better protecting our coastal ecology. This new SMCA is an opportunity to balance community needs with better protection of sensitive and threatened habitat. This could be a new model for MPAs to act as recreational parks in urban areas.

- *Petition 2023-23 MPA_AM1: Request to reclassify **Pacific Grove Marine Gardens** SMCA, **Edward F. Ricketts** SMCA, and **Carmel Bay** SMCA as SMRs; designate one new SMR in Monterey County at **Tanker's Reef**; and make various changes related to kelp restoration in the three reclassified SMRs, **Point Lobos** SMR, and the new SMR.*

Piers and jetties are essential for subsistence fishing communities. While I would support enhancing protections to directly benefit pier and jetty fishing, I cannot support enhancing the protection at Ricketts without a continued exception for hook and line fishing on the north side of the breakwater. Artificial enhancements and alterations of the marine environment should be done responsibly. With rare exception, I would prefer to see more meaningful, alternate conservation pathways and marine protections over artificial reefs.

Central Coast

- *Petition 2023-28MPA_AM2 (Tribally Co-led): Request to designate a new SMCA near **Point Sal** that allows recreational take of finfish by hook and line from shore, and to consult with tribes to identify a tribal name for the SMCA.*

I support the Northern Chumash Tribal Council's request for a new SMCA. This is an important opportunity to protect an ecologically significant area of the California coast that is a known larval retention zone and advance Tribal co-management. MPAs are a tool to naturally restore and recover important areas of the ocean, and that restoration must include renewed connection to the original stewards of the land and water. With the adjacent land area already protected, this SMCA can also enhance land-sea connectivity and offers an opportunity for true biodiversity protection within the Chumash Heritage National Marine Sanctuary, while enhancing shore-based recreational fishing.

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

I support the Santa Ynez Band of Chumash Indians' request for a new Tribally co-managed Mishopshno SMCA. The original south coast MPA designation process, which included this site, did not include Tribes and much of the intimidation and harassment that limited community input during the original designation process is still relevant today. Many stakeholders with commercial interests reference past deal-making to exclude Carpinteria Reef from protection. However, any reliance on past bargaining, which was never formally documented, upholds those injustices and exclusionary practices while also undermining the opportunity for younger and future generations to participate in adaptive management now and going forward.

The Mishopshno SMCA is an amazing opportunity to honor the historical significance of this area to the Chumash peoples, allow the Tribal community to return to and reconnect with traditional practices, and integrate these stewardship ideals and ways of knowing into our resource management structure. I also support Tribal take exemptions for all Tribal communities.

Mishopshno SMCA would also fill the largest gap in the MPA network, giving many communities in the region the opportunity to actually get to and experience the safety and benefits of our underwater state parks. And by protecting this small but ecologically significant and dynamic area, I see a clear opportunity for enhanced shore-fishing, supporting one of the most under-represented communities in fishery management within the broader fishing community. There are multiple reefs in the offshore area that are frequented by boat-based communities that will remain open, one quarter of the near-shore reef will be outside of the SMCA boundary and likely enhanced for all other fishing activity. I see this as a great opportunity to shift the flow of ocean benefits to communities that have been left out, while also minimizing the perceived negative, short term impact by the subset of the fishing community whose needs are often prioritized in your processes and decisions. Shore fishing alone will have significantly less of an impact than commercial passenger fishing vessel activity on this nearshore reef, helping boost the effectiveness of the MPA network while also supporting community use and needs.

- *Petition 2023-19MPA (Tribally Led): Request to designate a new MPA near **Morro Bay** as "**Chitqawi** SMCA" with a Tribal take exemption for the Santa Ynez Band of Chumash Indians.*

I support the proposal for the new Tribally co-managed Chitqawi SMCA to advance environmental justice for California's Tribal communities. This proposal could offer a model for the ocean equivalent of a wildlife corridor on land, but with protection from land to sea due to the existing adjacent state

park, ecological reserve, state marine reserve and state marine recreational management area. This proposal would then add coastal and offshore protections.

I request that the state formally consult with the petitioning Tribe to include a general recreational fishing allowance on the seaward side of the jetty. Piers and jetties are where most subsistence fishing is concentrated across the state. I believe this allowance will avoid enforcement challenges on the jetty and support lower income communities who may rely on this site while maintaining the level of protection the Tribe has indicated they want for the rest of the proposed MPA.

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

I support Tribal co-management for MPAs.

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

No position

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

No position

- *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; 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.*

No position

- *Petition 2023-27MPA_AM1: Request to modify **Anacapa Island** SMCA or Anacapa Island Special Closure to protect eelgrass meadows by limiting use of lobster traps in part or all of the SMCA.*

Please protect one of the few remaining eelgrass meadows by disallowing hard-bottom gear and anchoring year round. Eelgrass is a critical habitat type that is suffering from an incredibly significant decline. Eelgrass meadows are a carbon sink and support the early stage life cycle of many species I enjoy seeing and catching throughout kelp forests. This petition presents a clear problem and solution with site-specific research done by leading scientists on the topic. Eelgrass is able to recover in the ten months out of the year that lobster traps are limited at this site but is quickly lost in the two months when this fishery operates here. I support the year-round protection of this area.

- *Petition 2023-14MPA: Request to allow commercial take of sea urchins in nine MPAs including **Naples** SMCA and **Anacapa Island** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

- *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.*

Please deny this petition to weaken these MPAs. While I support science-backed opportunities to enhance recreational fishing, the justification here is based on policy gaps rather than scientific insight. The broader benefits of maintaining these Reserves—which were originally proposed from within the fishing community itself—to ecological health, scientific study, enhanced fishery management and global MPA best practices outweigh the limited potential benefits of weakening these areas.

The petition lacks supporting data to show that these closed areas have had a significant negative economic impact on the fisheries referenced. There is also no guarantee that all fishing methods proposed within these areas can be selective to only pelagic species; impacts to other species and bycatch are unavoidable. In fact, there's new science from around the world showing evolutionary responses of pelagic species to protected areas and it would be a shame to miss the opportunity to realize that benefit here.

For many anglers and spearfishers, Marine Reserves are an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically; I see value in letting species thrive within them and ask you to maintain these Reserves, which are among the state's largest and most effective protected areas.

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

No position.

South Coast

- *Petition 2023-24MPA_AM1: Request to shift the nearshore boundary between the **Laguna Beach** SMCA (No Take) and the **Dana Point** SMCA south to the Laguna Beach city limit, thereby increasing the nearshore area within the no-take SMCA.*

I support this proposed boundary change to protect the nearshore habitat from commercial activity, and urge you to consider a shore-based catch-and-release allowance in the no-take SMCA with a gear restriction of barbless hooks. The law that established the MPA network allows for trying things, experimenting, potentially failing but modifying with adaptive management. A catch-and-release area —where there is strong community support for protection—would be a helpful opportunity to understand the feasibility of enforcing catch-and-release and also the true ecological impact of this type of fishing. This could inform adaptive management going forward, with more potential opportunities for catch-and-release recreation in protected areas. This approach is a meaningful compromise, balancing community-led protection and recreational opportunity.

- *Petition 2023-14MPA: Request to allow the commercial take of sea urchin in nine MPAs including **Point Dume** SMCA, **Point Vicente** SMCA (No Take), and **Swami's** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

- *Petition 2023-33MPA_AM1: Request to expand the western boundary of **Point Dume** SMCA and change the take allowances to allow recreational take from shore by hook and line and spearfishing; and expand the boundaries of **Cabrillo** SMR westward and northward.*

I support the expansion at Pt. Dume and **Pt. Loma**/Cabrillo SMR as amended, which will enhance local and/or nearby fishing opportunities, especially for shore-based anglers.

At Pt. Dume, the expansion coupled with the shore fishing allowance is a worthwhile compromise. Especially given that Los Angeles is the largest urban area in the state and the barriers to even visiting an MPA—limited parking, hostile behavior, long hikes and staircases, land subsidence closing physical access points, etc.—this as a needed opportunity to enhance equitable access to our state's underwater parks.

At Pt. Loma, where the Cabrillo SMR is located, the northern boundary was adjusted based on angler feedback. By putting a popular shore-fishing area just outside the SMR, this will enhance fishing there, and potentially at nearby pier access points. The expansion would help this site be more aligned with scientific guidelines on effective sizing of MPAs. And given that the nearby MPA at Imperial Beach is closed due to toxic runoff and sewage, this expansion will enhance equitable access to the ocean and protected areas for all ocean-going communities.

Thank you for considering my input and for your dedication to a stronger MPA Network that benefits all of California's fishing communities.

Sincerely,

Jennifer Valentine

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

Submitted electronically to fgc@fgc.ca.gov

Re: 10/13/2026-10/16/2026 CA F&G Commission Meeting: Potential Impacts and Precedent Set by The OPC's Actions

Dear Commissioners:

The All Waters Protection & Access Coalition supports science-based adaptive management of California's Marine Protected Area Network. Adaptive management must work in both directions. Where evidence demonstrates that additional protection is necessary, the State should act. Where restrictions are not likely to produce meaningful conservation benefit, they should be reconsidered. Where the evidence remains uncertain, the State should resolve those uncertainties before making substantial regulatory changes that may be difficult, expensive and time-consuming to modify in the future.

California's MPA Network is often referred to as a global gold standard. If that is true, the process used to substantially change it should also represent a gold standard for scientific rigor, transparency and public trust. We are concerned that the process now before the Commission is in jeopardy of departing from that standard.

Following the 2023 Decadal Management Review, the Commission received 20 petitions containing more than 80 proposed changes to the MPA Network. Over the next two years, CDFW, Commission staff and OPC developed a detailed Bin 2 evaluation framework with substantial input from a diverse collection of stakeholders. The final framework was approved by the Commission on August 14, 2025,[1] and contained eighteen questions addressing MLPA goals, the DMR, science, network design, climate resilience, enforcement, socioeconomic impacts, equitable access, tribal interests, JEDI principles and coastal fishing communities.

According to the framework guidelines, CDFW then performed detailed petition-by-petition evaluations, based on MLPA goals and mandates, DMR results, climate resilience, and other adaptive-management considerations.2 The Department's evaluations were published on March 20, 2026. On the same day, OPC announced that it would provide their own petition-specific recommendations under a separate policy lens.[3] OPC's March 20 letter states that their plan to submit specific recommendations was done at the request of OPC Chair and Natural Resources Secretary Wade Crowfoot.[4] This was the first time the public heard of this plan, and the OPC recommendations were not submitted until over four months later, on July 31, 2026.

We do not question OPC's authority to offer guidance to the Commission on matters of policy, nor do we suggest that CDFW's technical evaluation is the only information the Commission may consider. We do question why, after OPC participated in development of the Commission-approved framework, a separate petition-specific review applying different criteria was first publicly introduced on the same day that CDFW's initial evaluations were released.

OPC acknowledges the distinction in their recommendations. They describe CDFW's work as a comprehensive evaluation conducted under a separate set of questions and criteria established by the Commission, while OPC's recommendations are based on whether proposed actions "hold promise" to strengthen the network and are rooted in a precautionary approach.[5] Those are not necessarily incompatible philosophies, but they are different evidentiary standards, and in several important cases they produce different regulatory recommendations from the same underlying record.

The Commission's decisions here will do more than determine the fate of the petitions currently before it. They will establish a precedent for how California adaptively manages its MPA Network in the future. Our primary concern is maintaining the integrity, transparency and predictability of the framework developed by CDFW, the Commission and the OPC over two years of careful and intentional discussion.

Stakeholders who spent years participating in this process deserve to understand when the additional OPC recommendation layer was established, why their separate criteria were not incorporated into the Commission-approved framework, how much weight those recommendations will be given, and how the Commission intends to resolve conflicts between the two analyses.

OPC's recommendations apply a precautionary policy lens under the 30x30 framework, but a future administration could have entirely different policy priorities. A process should therefore be judged not simply by whether we agree with its outcome today, but by whether we would consider the same process fair and legitimate if a future administration used it to reach the opposite outcome. Otherwise, the State risks creating an adaptive-management process in which stakeholders participate under one clearly defined framework while an additional set of criteria may subsequently influence the regulatory outcome. That would undermine predictability, stakeholder confidence and ultimately public trust in the MPA program itself.

While OPC identifies adaptive management of the MPA Network and the MPA petition process as part of California's broader coastal 30x30 strategy, they also stated that the numerical 30x30 target is not itself driving individual MPA petition decisions.[6] Those statements are not necessarily inconsistent. A strong MPA Network can contribute to California's broader biodiversity objectives while individual petition decisions remain governed by the MLPA, California's MPA Master Plans, relevant science and the adaptive-management process established by the Commission.

Our question is not simply whether 30x30 "caused" any particular recommendation. The more important question is where the boundary lies between California's 30x30 policy framework and the standards governing adaptive management of the existing MPA Network. If the 30x30 initiative is directly influencing petition-specific recommendations, the Commission should clearly explain how they relate to the standards contained in the MLPA, California's MPA Master Plans and the Commission-approved petition evaluation framework. 30x30 can provide broader policy context, but it should not substitute for the scientific and management justification required for an individual regulatory action.

Below we compare the outcomes of several CDFW and OPC evaluations:

At Anacapa Island, CDFW found insufficient evidence that bottom-contact fishing or boating during the limited annual fishing window is the primary driver of eelgrass loss or lack of recovery at Frenchy's Cove. CDFW also noted that stable eelgrass meadows persist elsewhere around Anacapa Island and the Channel Islands where fishing and boating activities occur and identified other potential site-specific drivers, including temperature, currents, substrate and the 2014-2016 marine heatwave. CDFW concluded that the proposed restrictions were unlikely to provide measurable, biologically meaningful benefits and recommended continued research and monitoring instead.[2]

OPC acknowledges data gaps regarding both eelgrass distribution and the causes of its persistence and loss, yet recommends prohibiting lobster traps in water shallower than 50 feet based on evidence that fishing gear can damage eelgrass.[5]

The disagreement is not whether fishing gear can damage eelgrass or whether eelgrass deserves protection. It is whether broader evidence of potential gear impacts is sufficient to justify substantial site-specific regulation where CDFW's review found that the proposed local causal relationship has not been demonstrated and identified other plausible drivers of the observed decline.

CDFW says the evidence has not crossed that threshold. OPC's precautionary standard supports action despite the acknowledged uncertainty.

At Mishopshno, CDFW supports Chumash co-stewardship, but concludes that creating a new MPA is not necessary to achieve it. The Department identifies alternative conservation and stewardship pathways and questions the ecological benefit relative to fishing impacts. OPC recommends creating the new MPA.[5]

Again, the issue is not the importance of tribal stewardship. It is whether an important objective establishes the necessity of a substantial regulatory mechanism when less restrictive alternatives exist, per the guidelines of the original MLPA framework.

The difference is even clearer with kelp resilience. CDFW recommended denying all seven actions in Petition 2023-33MPA. CDFW acknowledged that MPAs can support marine populations resilient to disturbance, but found that the extent to which those benefits translate into improved resistance or adaptation to climate-driven impacts on kelp remains uncertain and that the magnitude of any benefit is likely highly variable across space and time. Based on all of the relevant literature, CDFW concluded that more research is needed and that, if warming ocean temperatures are the primary driver of kelp decline, expanding MPA boundaries alone is unlikely to provide significant benefits.[2] CDFW went further, concluding that given these uncertainties, pursuing a substantial boundary expansion without a stronger scientific basis and coordinated management strategy would be premature.[2]

OPC nevertheless concludes that, “from a precautionary standpoint,” protecting additional persistent kelp is worth exploring and recommends expanding the Point Dume and Point Conception MPAs.[5]

This leaves the Commission with a fundamental question: when both the scientific and societal (i.e. JEDI) benefits are acknowledged to be uncertain and CDFW does not find demonstrated conservation need, is precautionary potential sufficient to justify substantial regulatory expansion? The Commission should answer that question explicitly before directing rulemaking.

All Waters is not arguing that every petition increasing protection should be denied. At Pyramid Point, CDFW identified a specific resource concern involving true smelt and supported eliminating recreational take while maintaining tribal take. Although these actions reduce recreational access, All Waters supports the recommendation because the management action is tied to an identifiable conservation concern.

We believe this is an example of adaptive management working. First identify whether a problem exists and a change is needed. Then determine the action that will best address the problem, consider the consequences, and tailor the regulation accordingly.

Too often, proposals for MPA expansion begin with a solution – more protection – then emphasize the evidence supporting that solution without adequately addressing substantial evidence suggesting that the proposed action may not solve the identified problem or that the problem itself has not been sufficiently demonstrated. An adaptive-management process should begin with the problem, not the preferred regulatory outcome.

These concerns are not limited to fishing organizations. Dr. Mark Carr, who has been deeply involved in designing, implementing, and monitoring California’s Marine Protected Area network, has described California as the “global gold standard for MPA networks” while questioning the need for additional MPAs before the existing system and its consequences are better understood.[7]

Whatever process the Commission legitimizes today will become part of the precedent for tomorrow. A transparent process should be durable enough to remain fair regardless of who occupies the Governor’s Office, who chairs OPC, what interests submit the next round of petitions, or whether the policy priorities of a future administration align with ours.

Before directing rulemaking on petitions where CDFW and OPC reach materially different conclusions, All Waters respectfully asks the Commission to:

1. Identify the evidentiary standard governing significant MPA regulatory changes, including whether precautionary potential alone can justify substantial expansion where demonstrated conservation need

remains unresolved, with particular emphasis given to guiding language in the MLPA, the MLMA and California's MPA Master Plans.

2. Clarify the relationship between CDFW's Commission-approved evaluation framework and OPC's subsequent policy recommendations, including when the separate OPC petition-specific review was established and how conflicting conclusions should be weighed.
3. Clarify the precedent being established for future adaptive-management reviews. If independent policy recommendations using separate criteria will become a formal part of future MPA review, that role and those criteria should be established before technical evaluations are completed, not first introduced as a separate petition-specific pathway when those evaluations are released.
4. Require meaningful site-specific evidence connecting the identified conservation problem to the proposed regulatory response, particularly where substantial loss of access will result.
5. Where material scientific uncertainty remains, prioritize targeted research, monitoring or adaptive alternatives before making substantial regulatory changes that may be difficult and costly to reverse.
6. Consider less restrictive alternatives where they can achieve the identified ecological, cultural or stewardship objective.
7. Meaningfully consider socioeconomic, community and access consequences as part of determining whether a particular management action is justified.
8. Clarify the role of 30x30 in individual petition decisions, including the relationship between 30x30 conservation frameworks and the standards governing adaptive management under the MLPA and California's MPA Master Plans.

We are grateful for the Commissioners' dedicated service and earnest commitment to public engagement.

Respectfully,

All Waters Protection & Access Coalition

Mike Raabe

Mike Raabe
Chief Creative Officer | Board Member

References

1. California Department of Fish and Wildlife, *Final Evaluation Framework for 2023 Marine Protected Area Bin 2 Petitions*, developed with support from California Fish and Game Commission and Ocean Protection Council staff; approved August 14, 2025.

2. California Department of Fish and Wildlife, *2023 MPA Petition Evaluations and Recommendations* and associated petition-specific evaluation and companion materials (March and July 2026). The CDFW document repository identifies the March 20 evaluations, July 31 Tribally-led evaluations, companion documents and final framework.

3. California Ocean Protection Council, March 20, 2026 announcement concerning CDFW's release of MPA petition evaluations and OPC's forthcoming policy recommendations.

4. California Ocean Protection Council, March 20, 2026 letter regarding the 2023 MPA petitions, including the request from OPC Chair and Natural Resources Secretary Wade Crowfoot and OPC's discussion of the geographic scope of the petitions.

5. California Ocean Protection Council, *Recommendations on Marine Protected Area Petitions* (July 31, 2026), including OPC's evaluation approach and petition-specific recommendations.

6. California Ocean Protection Council, California 30x30 coastal-waters materials, including the *Pathways to 30x30 California* framework, coastal conservation strategy materials, and California-adapted MPA Guide materials.

7. Dr. Mark Carr, public comments and testimony concerning California's MPA Network, adaptive management, scientific evaluation and stakeholder participation.

8. *Marine Life Protection Act*, Fish and Game Code §§ 2850 et seq.; *Marine Life Management Act*, Fish and Game Code §§ 7050 et seq.; California Fish and Game Commission, *Master Plan for Marine Protected Areas* (2008 and 2016).

Outlook

Proposed MPA expansion

From Joe Huettl
Date Tue 09/22/2026 02:54 PM
To FGC <FGC@fgc.ca.gov>

Dear Members of the Fish and Game Commission,

I am writing to express my desire to not be further restricted from access to fishing due to the expansion of MPAs.
I have had several old favorite fishing areas, including Franklin Point at Año Nuevo, closed to me when they were designated as MPAs.
I've adapted to that loss, but do not wish to face further restrictions on the ability to fish our coasts.
I feel that the resources can be managed through species-specific regulations that can be adjusted more easily and adapt to the conditions of the resource, rather than locking in a complete shut down.
As a kayak fisherman based in Northern California, my particular areas of concern are areas around Duxbury Reef, Natural Bridges, Pleasure Point and Monterey.

So please consider denying most of the expansions of MPAs.
I believe species-specific regulations are more effective and adaptable.

Joseph Huettl
Walnut Creek, CA

September 23, 2026

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

Re: Support for Ocean Protection Council Recommendations to Strengthen California's Marine Protected Area Network

Dear President Sklar and Honorable Commissioners:

On behalf of California Interfaith Power & Light and the faith communities we serve, we write in support of the Ocean Protection Council's recommendations to strengthen California's marine protected area network through the state's adaptive management process.

Across our diverse faith traditions, caring for Creation and protecting the vulnerable are moral responsibilities. California Interfaith Power & Light has long recognized that people of faith and conscience can provide values-based leadership on climate change and social justice, helping our communities consider not only what is possible, but what is right. Protecting the ocean — our shared and common home — is one expression of that responsibility.

We appreciate that the Ocean Protection Council has recommended that several petitions for new or expanded marine protected areas move forward. We are particularly encouraged that OPC's petition recommendations are rooted in a precautionary approach — an important principle at a time when climate change, biodiversity loss, and other pressures are rapidly reshaping California's ocean and coast. Acting with precaution reflects a responsibility to protect what we have inherited even when we cannot predict with certainty how these ecosystems will change.

We also strongly support OPC's consideration of whether petitions would help revitalize Tribally led stewardship, and its commitment to advancing cogovernance, co-management, and collaborative stewardship with Tribes through marine protected area adaptive management. This is both a conservation priority and a matter of justice. Indigenous peoples have cared for California's lands and waters since time immemorial, and strengthening opportunities for Tribal leadership and stewardship is an important step toward a more just relationship with both people and place.

The proposed Mishopshno and Point Sal State Marine Conservation Areas are powerful examples of what this approach can look like in practice. Both would add important ecological

protections to California's marine protected area network while elevating Tribal stewardship and maintaining meaningful connections between people and the ocean.

Mishopshno, proposed by the Santa Ynez Band of Chumash Indians, Natural Resources Defense Council, and the Environmental Defense Center, would protect a remarkable stretch of coast that includes Carpinteria Reef, persistent kelp habitat, wetlands and estuary habitat, and areas used by juvenile white sharks. It would also recognize the deep cultural significance of this place to the Chumash people and create opportunities for greater Tribal participation in environmental stewardship.

Point Sal, proposed by the Northern Chumash Tribal Council and Natural Resources Defense Council, provides another compelling example. Protecting this relatively undisturbed and biologically rich coastline would strengthen ecological resilience while advancing Tribal co-stewardship and maintaining opportunities for cultural, subsistence, recreational, educational, and community use. OPC has recommended approval of both the Point Sal and Mishopshno proposals.

These proposals, together with the other protections recommended by OPC, ask us to think beyond the boundaries of individual marine protected areas. They ask what kind of relationship we want Californians to have with the ocean, whose knowledge and stewardship we value, and what kind of inheritance we leave to those who come after us. For faith communities, these are fundamentally moral questions.

We urge the California Fish and Game Commission to adopt the Ocean Protection Council's recommendations for strengthening California's marine protected area network. Doing so would apply a thoughtful, precautionary approach to protecting our ocean, advance opportunities for Tribal stewardship, and help safeguard the extraordinary places and living communities entrusted to our care.

This is an opportunity for California to act not only on what science tells us is prudent, but on what our shared values tell us is right — to care for our common home and protect it for generations to come.

Sincerely,

Susan Stephenson
Executive Director
California Interfaith Power & Light

west marin environmental action committee

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September 25, 2026

California Fish and Game Commission
P.O. Box 944209,
Sacramento, CA 94244-2090
Via Electronic Mail: fgc@fgc.ca.gov

RE: Fish & Game Commission October 14-16 Meeting: *Marine protected area petitions:* Tribally led and co-led petitions

Dear President Sklar and Commissioners,

Established in 1971, the Environmental Action Committee of West Marin (EAC)'s mission is to protect and sustain West Marin's lands, waters, and biodiversity. We represent approximately 1,200 community members, primarily in West Marin. We have been very involved in the petition process, including submitting two petitions. **We are taking this opportunity to indicate our support for the Ocean Protection Council (OPC)'s recommendations regarding the five Tribally led and co-led Marine Protected Area (MPA) petitions included in the California Fish and Game Commission (Commission)'s August 11, 2026, Tribal Committee meeting materials.** California's Tribal entities must be involved in marine conservation and decision-making, and this is a key opportunity. We urge the Commission to approve these petitions and continue strengthening and increasing the size of California's MPA Network.

California has long been a global leader in marine conservation. Approving these petitions would build on that leadership by establishing new MPAs, expanding existing protections, improving MPA boundaries and regulations, and strengthening Tribal stewardship of California's coast and ocean.

We support the petitions led or co-led by the Santa Ynez Band of Chumash Indians, Tolowa Dee-ni' Nation, and Northern Chumash Tribal Council. Together, the petitions would establish new protections at Chitqawi in Morro Bay, Point Sal, and Mishopshno off Carpinteria; expand protections at Point Buchon; and update protections at Pyramid Point. Approving these petitions would recognize Tribes' profound connection to the coast and advance Tribal stewardship and co-management of California's marine resources.

As OPC's recommendations recognize, advancing the petitions would support California's commitments to government-to-government relationships and Tribal stewardship. It would also advance key recommendations from the MPA Decadal Management Review, including improving Tribal engagement, creating a clear pathway to Tribal MPA management, and better incorporating marine cultural heritage into the MPA Network.

We respectfully encourage the Commission to adopt OPC's recommendations, approve these petitions, and continue increasing the size, connectivity, and effectiveness of California's MPA Network. Taking these actions would advance Tribal stewardship and help California continue to be a global conservation leader.

Thank you for your consideration and continued leadership in protecting California's coast for current and future generations.

Sincerely,



Ashley Eagle-Gibbs
Executive Director
Environmental Action Committee of West Marin

Outlook

A Stronger MPA Network for Better Fishing

From Stephen Tyler
Date Fri 09/25/2026 09:46 AM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

Thank you for the opportunity to comment and for taking time to hear the perspectives of constituents from across the state. As someone who enjoys fishing along the California coast, I urge you to consider updates to the Marine Protected Area Network that will bolster the health of our fisheries for generations to come.

General Comments

This is a critical opportunity for you to help ocean-going communities and ensure that the ecosystems along our coast can withstand and recover from heatwaves and other imminent threats. Many of us in the fishing community believe science-based approaches to conservation are necessary to restore the abundance of our fisheries. We hope you will use MPA adaptive management to consider the needs of communities that are often left out of your decisions, including many of us in the fishing community and other ocean users.

Climate change was not explicitly considered in the design of the current MPA Network and—like equity and environmental justice—was supposed to be a key component of the Department's evaluation of the MPA petitions but was largely ignored. Given that MPAs were shown to be more resilient to the stresses of the last decade, such as the marine heatwave, I urge you to enhance the Network to protect species and biodiversity as an insurance policy for future uncertainties. You have a critical and timely opportunity to make sure our MPAs can keep us fishing beyond the new marine heatwave and pending El Niño. Actions to strengthen the MPA Network for climate resilience will also support more equitable use and recreation for future generations of anglers and spearfishers.

Climate change has also added uncertainty to the little that we do know about our vast and dynamic ocean. MPAs are a living laboratory that can help us understand how marine ecosystems function, and how they are impacted by climate change. This enhanced knowledge supports better fishery management and can help us continue to adapt the MPA Network to better serve all Californians into the future.

The Network should also be seen as an opportunity to reconnect California's Indigenous communities with their native waters, restore Tribal stewardship, and better understand how to incorporate

Traditional Ecological Knowledge into MPA management and decision-making. Many communities, including Tribes, conservation-minded fishers, and others who enjoy the ocean, were not considered when the MPAs were designated. These communities should be prioritized in your decision-making process this time around in order to advance equitable access to the ocean and fisheries. MPAs should be used as a tool to repair—not reinforce—imbalances in our fishery management system.

At a minimum, please advance the Ocean Protection Council's recommendations, and keep the integrity of the current MPA Network by rejecting petitions that would weaken existing protections in favor of commercial interests, particularly in our State Marine Reserves.

Other regional and site specific input is below:

North Coast

- *Petition 2023-21MPA: Request to modify **Pyramid Point** SMCA to remove recreational take of surf smelt, and continue current tribal take exemption for Tolowa Dee ni' Nation.*

Please advance the requests of the Tolowa Dee ni' Nation.

- *Petition 2023-14MPA: Request to allow commercial take of sea urchins in nine MPAs including **Double Cone Rock** SMCA, **Sea Lion Cove** SMCA, **Salt Point** SMCA and **Stewart's Point** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

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

Please deny this petition to weaken the MPA Network. California's commercial salmon fishery has just reopened from a three-year closure, making this a time for caution and recovery, not new fishing pressure in fully protected reserves. Moreover, the petition 1) lacks evidence showing harm to the

industry, 2) has misappropriated the principles of justice, equity, diversity and inclusion for commercial interests, 3) ignores unavoidable bycatch impacts, and 4) risks weakening the few effective State Marine Reserves which are integral climate refugia and the backbone of our MPA Network.

- *Petition 2023-32MPA: Expand **Duxbury Reef** SMCA to protect the intertidal zone and allow limited recreational fishing.*

Please advance the modified proposal to protect the intertidal areas of Duxbury Reef. There's value to so many communities in protecting the full extent of Duxbury Reef's sensitive and biodiverse habitat, and I believe that additional protection for the more sensitive intertidal zone while still allowing some recreational fishing is a practical compromise.

- *Petition 2023-33MPA_AM1: Request to expand the boundaries of **Natural Bridges** SMR and designate a new SMCA off **Pleasure Point**, in Santa Cruz County.*

Shore-based use is already restricted at Natural Bridges, so I support expanding this reserve to a meaningful size which will make it more consistent with science-based guidelines on effective MPA sizing. Over time, this expansion would enhance nearby recreational fishing, with little to no short-term harm to marginalized fishing communities.

At Pleasure Point, I appreciate the petitioners' amendments to allow some recreational fishing and support the petition as amended. The law that established our MPA Network allows us to take risks, and understand what may work or not work for different communities while better protecting our coastal ecology. This new SMCA is an opportunity to balance community needs with better protection of sensitive and threatened habitat. This could be a new model for MPAs to act as recreational parks in urban areas.

- *Petition 2023-23 MPA_AM1: Request to reclassify **Pacific Grove Marine Gardens** SMCA, **Edward F. Ricketts** SMCA, and **Carmel Bay** SMCA as SMRs; designate one new SMR in Monterey County at **Tanker's Reef**; and make various changes related to kelp restoration in the three reclassified SMRs, **Point Lobos** SMR, and the new SMR.*

Piers and jetties are essential for subsistence fishing communities. While I would support enhancing protections to directly benefit pier and jetty fishing, I cannot support enhancing the protection at Ricketts without a continued exception for hook and line fishing on the north side of the breakwater. Artificial enhancements and alterations of the marine environment should be done responsibly. With rare exception, I would prefer to see more meaningful, alternate conservation pathways and marine protections over artificial reefs.

Central Coast

- *Petition 2023-28MPA_AM2 (Tribally Co-led): Request to designate a new SMCA near **Point Sal** that allows recreational take of finfish by hook and line from shore, and to consult with tribes to identify a tribal name for the SMCA.*

I support the Northern Chumash Tribal Council's request for a new SMCA. This is an important opportunity to protect an ecologically significant area of the California coast that is a known larval retention zone and advance Tribal co-management. MPAs are a tool to naturally restore and recover important areas of the ocean, and that restoration must include renewed connection to the original stewards of the land and water. With the adjacent land area already protected, this SMCA can also enhance land-sea connectivity and offers an opportunity for true biodiversity protection within the Chumash Heritage National Marine Sanctuary, while enhancing shore-based recreational fishing.

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

I support the Santa Ynez Band of Chumash Indians' request for a new Tribally co-managed Mishopshno SMCA. The original south coast MPA designation process, which included this site, did not include Tribes and much of the intimidation and harassment that limited community input during the original designation process is still relevant today. Many stakeholders with commercial interests reference past deal-making to exclude Carpinteria Reef from protection. However, any reliance on past bargaining, which was never formally documented, upholds those injustices and exclusionary practices while also undermining the opportunity for younger and future generations to participate in adaptive management now and going forward.

The Mishopshno SMCA is an amazing opportunity to honor the historical significance of this area to the Chumash peoples, allow the Tribal community to return to and reconnect with traditional practices, and integrate these stewardship ideals and ways of knowing into our resource management structure. I also support Tribal take exemptions for all Tribal communities.

Mishopshno SMCA would also fill the largest gap in the MPA network, giving many communities in the region the opportunity to actually get to and experience the safety and benefits of our underwater state parks. And by protecting this small but ecologically significant and dynamic area, I see a clear opportunity for enhanced shore-fishing, supporting one of the most under-represented communities in fishery management within the broader fishing community. There are multiple reefs in the offshore area that are frequented by boat-based communities that will remain open, one quarter of the near-shore reef will be outside of the SMCA boundary and likely enhanced for all other fishing activity. I see this as a great opportunity to shift the flow of ocean benefits to communities that have been left out, while also minimizing the perceived negative, short term impact by the subset of the fishing community whose needs are often prioritized in your processes and decisions. Shore fishing alone will have significantly less of an impact than commercial passenger fishing vessel activity on this nearshore reef, helping boost the effectiveness of the MPA network while also supporting community use and needs.

- *Petition 2023-19MPA (Tribally Led): Request to designate a new MPA near **Morro Bay** as "**Chitqawi** SMCA" with a Tribal take exemption for the Santa Ynez Band of Chumash Indians.*

I support the proposal for the new Tribally co-managed Chitqawi SMCA to advance environmental justice for California's Tribal communities. This proposal could offer a model for the ocean equivalent of a wildlife corridor on land, but with protection from land to sea due to the existing adjacent state

park, ecological reserve, state marine reserve and state marine recreational management area. This proposal would then add coastal and offshore protections.

I request that the state formally consult with the petitioning Tribe to include a general recreational fishing allowance on the seaward side of the jetty. Piers and jetties are where most subsistence fishing is concentrated across the state. I believe this allowance will avoid enforcement challenges on the jetty and support lower income communities who may rely on this site while maintaining the level of protection the Tribe has indicated they want for the rest of the proposed MPA.

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

I support Tribal co-management for MPAs.

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

No position

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

No position

- *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; 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.*

No position

- *Petition 2023-27MPA_AM1: Request to modify **Anacapa Island** SMCA or Anacapa Island Special Closure to protect eelgrass meadows by limiting use of lobster traps in part or all of the SMCA.*

Please protect one of the few remaining eelgrass meadows by disallowing hard-bottom gear and anchoring year round. Eelgrass is a critical habitat type that is suffering from an incredibly significant decline. Eelgrass meadows are a carbon sink and support the early stage life cycle of many species I enjoy seeing and catching throughout kelp forests. This petition presents a clear problem and solution with site-specific research done by leading scientists on the topic. Eelgrass is able to recover in the ten months out of the year that lobster traps are limited at this site but is quickly lost in the two months when this fishery operates here. I support the year-round protection of this area.

- *Petition 2023-14MPA: Request to allow commercial take of sea urchins in nine MPAs including **Naples** SMCA and **Anacapa Island** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

- *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.*

Please deny this petition to weaken these MPAs. While I support science-backed opportunities to enhance recreational fishing, the justification here is based on policy gaps rather than scientific insight. The broader benefits of maintaining these Reserves—which were originally proposed from within the fishing community itself—to ecological health, scientific study, enhanced fishery management and global MPA best practices outweigh the limited potential benefits of weakening these areas.

The petition lacks supporting data to show that these closed areas have had a significant negative economic impact on the fisheries referenced. There is also no guarantee that all fishing methods proposed within these areas can be selective to only pelagic species; impacts to other species and bycatch are unavoidable. In fact, there's new science from around the world showing evolutionary responses of pelagic species to protected areas and it would be a shame to miss the opportunity to realize that benefit here.

For many anglers and spearfishers, Marine Reserves are an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically; I see value in letting species thrive within them and ask you to maintain these Reserves, which are among the state's largest and most effective protected areas.

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

No position.

South Coast

- *Petition 2023-24MPA_AM1: Request to shift the nearshore boundary between the **Laguna Beach** SMCA (No Take) and the **Dana Point** SMCA south to the Laguna Beach city limit, thereby increasing the nearshore area within the no-take SMCA.*

I support this proposed boundary change to protect the nearshore habitat from commercial activity, and urge you to consider a shore-based catch-and-release allowance in the no-take SMCA with a gear restriction of barbless hooks. The law that established the MPA network allows for trying things, experimenting, potentially failing but modifying with adaptive management. A catch-and-release area —where there is strong community support for protection—would be a helpful opportunity to understand the feasibility of enforcing catch-and-release and also the true ecological impact of this type of fishing. This could inform adaptive management going forward, with more potential opportunities for catch-and-release recreation in protected areas. This approach is a meaningful compromise, balancing community-led protection and recreational opportunity.

- *Petition 2023-14MPA: Request to allow the commercial take of sea urchin in nine MPAs including **Point Dume** SMCA, **Point Vicente** SMCA (No Take), and **Swami's** SMCA.*

I urge you to deny this petition to weaken the MPA Network because it favors one commercial group at the expense of all others who rely on the ocean. The petition itself also misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the SMCAs requested would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of kelp barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable.

The petition provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs to justify the request. A commercial fishery is managed to try and sustain a population for future harvest, not to restore an ecosystem. The justification is ecologically counterproductive and we already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas.

- *Petition 2023-33MPA_AM1: Request to expand the western boundary of **Point Dume** SMCA and change the take allowances to allow recreational take from shore by hook and line and spearfishing; and expand the boundaries of **Cabrillo** SMR westward and northward.*

I support the expansion at Pt. Dume and **Pt. Loma**/Cabrillo SMR as amended, which will enhance local and/or nearby fishing opportunities, especially for shore-based anglers.

At Pt. Dume, the expansion coupled with the shore fishing allowance is a worthwhile compromise. Especially given that Los Angeles is the largest urban area in the state and the barriers to even visiting an MPA—limited parking, hostile behavior, long hikes and staircases, land subsidence closing physical access points, etc.—this as a needed opportunity to enhance equitable access to our state's underwater parks.

At Pt. Loma, where the Cabrillo SMR is located, the northern boundary was adjusted based on angler feedback. By putting a popular shore-fishing area just outside the SMR, this will enhance fishing there, and potentially at nearby pier access points. The expansion would help this site be more aligned with scientific guidelines on effective sizing of MPAs. And given that the nearby MPA at Imperial Beach is closed due to toxic runoff and sewage, this expansion will enhance equitable access to the ocean and protected areas for all ocean-going communities.

Thank you for considering my input and for your dedication to a stronger MPA Network that benefits all of California's fishing communities.

Sincerely,

Stephen Tyler

Outlook

Opinion Piece in Support of Strengthening Marine Protections

From Fiorenza Micheli
Date Tue 09/29/2026 10:16 AM
To FGC <FGC@fgc.ca.gov>
Cc Nur Arafeh Dalmau

Dear President Sklar and Commissioners,

We are writing to share our recent Capitol Weekly op-ed on the role marine protected areas can play in helping California's kelp forests respond to a warming ocean.

Our research shows that, under certain conditions, strong, well-designed MPAs can help kelp forests withstand and recover from marine heatwaves. As the Commission considers changes to California's MPA network, we hope you will consider this evidence and the opportunity to strengthen protections for these important ecosystems.

Thank you for your consideration.

Sincerely,

Fiorenza Micheli

Marine ecologist and conservation biologist at the Hopkins Marine Station at Stanford University, Professor in the Oceans Department and co-director of Stanford Center for Ocean Solutions.

Nur Arafeh Dalmau

Marine ecologist and climate adaptation researcher at Hopkins Marine Station at Stanford University and the co-chair of the IUCN Seaweed Specialist Group.

CAPITOL WEEKLY (https://capitolweekly.net)
COVERING CALIFORNIA GOVERNMENT AND POLITICS

OPINION

California can't afford to weaken ocean protections in a warming world



BY ***FIORENZA MICHELI and NUR ARAFEH DALMAU*** POSTED 08.03.2026

Capitol Weekly welcomes Opinions on California public policy or politics. Please read our guidelines for opinion pieces before submitting an Op-Ed (https://capitolweekly.net/about-us/submission-guidelines-for-op-eds/). *Submissions that do not adhere to our guidelines will not be considered for publication.*

OPINION — At a time when California needs stronger ocean protections, the status quo is a step back.

The California Department of Fish and Wildlife recently considered a set of proposals to strengthen or expand Marine Protected Areas (MPAs)—and recommended denying nearly all of them. This comes as California has committed to protecting at least 30 percent of its lands and coastal waters by 2030 (https://urldefense.com/v3/__https:/resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0L9T75CO$). Our research shows that well-designed, strongly protected MPAs are among the most effective tools the state has to help kelp forests survive a rapidly warming ocean.

For over a decade, Pacific Ocean waters have experienced an unprecedented series of marine heatwaves (https://urldefense.com/v3/__https:/www.integratedecosystemassessment.noaa.gov/regions/california-current/california-current-marine-heatwave-tracker-blobtracker__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0IVJrKYm$), including a particularly severe event from 2014 to 2016, referred to as "the Blob". Another is now underway, with ocean warming intensifying (https://urldefense.com/v3/__https:/www.youtube.com/watch?v=W3Awdw3-v0g__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0Bpnfxwd$)off the California coast, threatening to become yet another severe (https://urldefense.com/v3/__https:/www.theguardian.com/us-news/2026/apr/04/high-ocean-

temperatures-california-marine-heatwave__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0A6MZv5e$)event. These events are transforming marine ecosystems—disrupting food webs, harming fisheries, and causing cascading ecological effects.

The consequences are already visible. Marine heatwaves have caused widespread seabird die-offs, declines in forage fish, and starvation among marine mammals. Harmful algal blooms and marine mammal entanglement in fishing gear have forced the closure (https://urldefense.com/v3/__https:/www.sfgate.com/food/article/Last-year-s-Dungeness-crab-season-declared-a-10872785.php__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0ENEVglC$) of California's valuable Dungeness crab fishery. Scientists describe this as a "massive reorganization (https://urldefense.com/v3/__https:/theconversation.com/the-worlds-longest-marine-heat-wave-upended-ocean-life-across-the-pacific-260792__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0A_jgE3C$)" of ocean life.

Few ecosystems exemplify this disruption more clearly than kelp forests (https://urldefense.com/v3/__https:/oceanservice.noaa.gov/facts/kelp.html__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0HZHN74v$). These underwater habitats support more than a thousand species and rank among the most productive ecosystems on Earth. Yet in recent years, California has experienced widespread declines along its coast—with Northern California losing up to 90 percent of its kelp (https://urldefense.com/v3/__https:/www.sciencedirect.com/science/article/pii/S0006320723002343?via*3Dihub__;JQ!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0E6Xfybd$)—transforming lush underwater forests into barren seafloors.

Marine heatwaves are a major driver, but not the only factor. Kelp forest collapse results from multiple stressors working in tandem: ocean warming and acidification, pollution, ocean and coastal development, and fishing. Fishing removes key predators. Fewer predators mean more urchins—and as their numbers surge unchecked, they devour what remains of the kelp, transforming entire ecosystems into "urchin barrens" that stall recovery.

Kelp forests are naturally resilient and can often recover from disturbances. But when these pressures combine, that resilience breaks down and recovery becomes far less likely.

This is where marine protected areas can make a decisive difference.

Our research shows that MPAs can help restore the ecological balance that kelp forests need to recover. By limiting fishing, strongly protected MPAs allow key predators—such as lobster and sheephead—to rebound. These species play a critical role in controlling urchin populations, reducing grazing pressure, and giving kelp a chance to regrow.

In one study (https://urldefense.com/v3/__https:/besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2664.70112__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0OlSbbVc$), we analyzed decades of satellite data (https://urldefense.com/v3/__https:/kelpwatch.org/__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0Prz4rjP$) to compare kelp abundance inside and outside California's MPAs. We found that kelp forests in Southern California MPAs rebounded more *quickly* from the 2014–2016 heatwave than those in unprotected areas. A second study (https://urldefense.com/v3/__https:/onlinelibrary.wiley.com/doi/10.1111/gcb.17620__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0OjfysI_$) found that where predators were protected, urchin populations remained in check, and kelp proved more resilient. Where predators were not protected, this advantage disappeared.

These findings reinforce a broader point: MPAs do more than rebuild fish populations (https://urldefense.com/v3/__https:/conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.14435__;!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0IKVdva0$). By protecting biodiversity and

restoring key ecological relationships, they make marine ecosystems more stable and better able to withstand change—much like a diversified investment portfolio reduces risk.

California's MPA network was designed to protect a wide range of marine habitats. But as climate impacts intensify, the state must keep pace. Expanding protections to include more climate-resilient areas, such as California's most persistent kelp forests (https://urldefense.com/v3/__https:/www.sciencedirect.com/science/article/pii/S0006320723002343?via*3Dihub__;JQ!!G92We9drHetJ8EofZw!eNlgoligNibbt-vu2LPak02A4GTryvIg_meSdZUz-XJF7bG1cpaZm_oXSqPzqmemV7xiU_ulzF00aLC-0E6Xfybd$), would be a practical, science-based step toward safeguarding these ecosystems.

MPAs alone are not a silver bullet. They cannot stop ocean warming or prevent marine heatwaves. But they can improve the conditions that allow ecosystems to recover. Without that support, recovery becomes far less likely—and losses may become permanent. The stakes extend far beyond kelp. These ecosystems support fisheries, tourism, coastal economies, Tribal communities, and countless species that depend on healthy ocean habitats. Their decline is not just an environmental issue—it is an economic and cultural one as well.

California has positioned itself as a global leader in ocean conservation. It has the science, the tools, and the policy framework to meet its 30×30 goals. But leadership requires action that matches ambition. At a time when climate change and ocean industrialization are accelerating, and marine ecosystems are under increasing stress, maintaining the status quo is a risk California should not take.

The science is clear. Strong, well-designed marine protected areas can help kelp forests—and the communities that depend on them—endure a warming ocean. The question is whether California will act on that science before more of these ecosystems disappear.

Fiorenza Micheli (https://oceansolutions.stanford.edu/people/fiorenza-micheli) *is a marine ecologist and conservation biologist at the Hopkins Marine Station at Stanford University, Professor in the Oceans Department and co-director of Stanford Center for Ocean Solutions. Nur Arafeh Dalmau* (https://hopkinsmarinestation.stanford.edu/people/nur-arafeh-dalmau) *is a marine ecologist and climate adaptation researcher at Hopkins Marine Station at Stanford University and the co-chair of the IUCN Seaweed Specialist Group.*

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Outlook

Public Comment Letter on MPA Petitions

From Wendy Tochihara
Date Sun 09/27/2026 03:41 PM
To FGC <FGC@fgc.ca.gov>

Dear President, Commissioners, and Staff,

Thank you for the opportunity to provide comment on the Marine Protected Area petitions scheduled for October fourteen through sixteen. I appreciate the Commission's commitment to a respectful and inclusive process and the stated goal of providing a safe environment for sharing knowledge, experiences, ideas, and perspectives while upholding environmental justice and equitable access for all Californians.

As a lifelong recreational angler and coastal stakeholder, I strongly support science based adaptive management of California's MPA network. I also support the position articulated by CCA California, which emphasizes maintaining access, improving monitoring, and ensuring that any proposed changes are grounded in measurable biological need rather than precautionary assumptions or unsupported expansion.

California's MPA network is already one of the largest and most restrictive in the world. The Decadal Review confirmed that the network is functioning as designed and that broad expansions are not warranted. Many of the petitions before you propose new closures, special closures, or boundary changes that would significantly restrict recreational access without clear ecological justification.

Water Quality Failures Are the Real Ecological Threat

Across Southern California, several MPAs are experiencing chronic water quality degradation from land based pollution sources. These impacts are far more damaging to marine life than responsible recreational fishing.

Laguna Beach State Marine Reserve

Laguna Beach has a sewage outfall located inside the MPA. It has leaked multiple times over the years, causing beach closures, bacterial exceedances, and degraded water quality inside the protected area. When an MPA contains a sewage outfall that periodically leaks, it raises serious questions about whether expanding closures or adding special restrictions is an effective or equitable management strategy. Protecting marine resources requires addressing actual environmental stressors rather than restricting low impact users.

Swami’s MPA in Encinitas

Water quality issues also affect Swami’s MPA, which is regularly impacted by cross border sewage contamination from the Tijuana River. When the river flows north during certain ocean conditions, contamination spreads along the San Diego coastline, triggering health advisories and degrading water quality inside MPAs. No amount of fishing restrictions can stop sewage from entering the ocean.

Laguna Beach Sand Placement

Laguna Beach’s emergency sand placement activities, conducted above the mean high tide line, demonstrate another land based impact that directly affects the MPA. Coastal engineering principles are clear. Sand placed upslope moves downslope. In Laguna, this sand is settling directly onto intertidal reef and rocky habitat inside the MPA. This is a real world example of how actions taken outside an MPA can still degrade the resources inside it.

These Examples Prove a Critical Point

MPA expansions do not fix water quality problems.
MPA expansions do not fix sewage contamination.
MPA expansions do not fix land based habitat impacts.

If the Commission is concerned about protecting marine ecosystems, then addressing sewage outfalls, stormwater, cross border contamination, and shoreline alteration is far more effective than restricting responsible recreational anglers.

Recommendations

In light of the evidence, I respectfully urge the Commission to:

One Deny petitions proposing new closures or expansions without strong scientific justification. Water quality failures are the real threats to MPAs like Laguna and Swami’s.

Two Prioritize monitoring, enforcement, and interagency coordination over expanding the footprint of the MPA network. Better data leads to better decisions.

Three Address land based impacts, including sewage outfalls, stormwater, cross border contamination, and sand placement, that directly harm protected habitat. These issues must be part of any serious conservation strategy.

Four Protect equitable recreational access as part of the Commission’s environmental justice commitments. Closures disproportionately affect everyday Californians.

Five Ensure consistency with the Decadal Review framework and avoid piecemeal expansions. The MPA network must be managed holistically.

California’s anglers care deeply about the ocean and have a long history of stewardship. We support conservation that is fair, effective, and grounded in science. We ask the Commission to uphold these principles as you deliberate on the bin two petitions.

Thank you for your time, your service, and your commitment to a transparent and inclusive process.

Respectfully,
Wendy Tochihara
Recreational Angler and Coastal Stakeholder



CALIFORNIA WETFISH PRODUCERS ASSOCIATION
1621 W. 25th Street, #191, San Pedro, CA 90732 * www.Californiawetfish.org * (907) 317-9127

September 27, 2026

Mr. Eric Sklar, President
California Fish and Game Commission
VIA EMAIL

Re: Bin 2 Marine Protected Area Petitions

Dear President Sklar and Honorable Commissioners:

Thank you for the opportunity to comment on the Commission's consideration of Bin 2 Marine Protected Area (MPA) petitions. The California Wetfish Producers Association (CWPA) continues to **strongly support the recommendations of the California Department of Fish and Wildlife** (the Department). We believe that the Department's review rightfully distinguished petitions based on their potential to strengthen the State's existing MPA network and achieve the goals set out in the design of that network. Further, only the Department's evaluation considered the social and economic impacts of granting petitions and their potential to disrupt the balance achieved in the development of the State's existing MPA network.

CWPA is a trade group representing harvesters and processors in the California coastal pelagic fisheries (CPS), including market squid, sardine, anchovy, and mackerels. The market squid fishery is the State's largest commercial fishery by volume and often by value. It is certified sustainable by the Marine Stewardship Council and rated as green "Best Choice" by Monterey Aquarium's Seafood Watch ratings program. It is by far the most important fishery for our members, typically representing over three-fourths of our catch and revenues. Our members and their operations are a critical part of California's fishing economy, playing an important role in coastal communities such as Monterey, Moss Landing, Ventura, and San Pedro/Terminal Island, where we support both fishing infrastructure and regional economies.

California's existing MPAs are a network of areas receiving protected status to promote diversity and abundance of marine life and protect biodiversity and habitats. An inclusive, comprehensive, and thorough process developed the existing network of areas. That work established important balances in protections and permitted uses to ensure the greatest benefits are derived from the network. The Department's recommendations reflect the importance of the network balancing of these various interests and the need for changes to be evaluated as part of the network, as a whole (rather than as piecemeal modifications); therefore, we support the Department's recommendations.

The following comments on specific petitions are in order of your consideration and reflect their specific importance to our fleet and members.

Petition 2023-33_AM1 – expand 6 MPAs and add a new MPA

These petitions in general will displace our fleet from important squid harvesting areas based on a speculative benefit to kelp resilience that might arise from the MPA expansion. To justify the expansion, the petition includes rocky bottom areas where kelp has demonstrated resilience without protection; however, the proposed areas extend to expansive soft bottom areas that cannot support kelp growth. The petitions (and petitioners through their outreach) have disregarded the importance of these soft bottom areas to our fleet, as well as our gear's compatibility with a high level-of-protection. Specifically, our gear cannot be fished in hard bottom areas capable of supporting kelp. Displacing our fleet from these soft bottom areas will impose additional operational (i.e., time and fuel) costs, as we are compelled to fish less productive and/or more distant areas. These costs will be imposed at a challenging time, as fuel costs have increased substantially in recent months.

- 5 Point Conception

The area at Point Conception has long supported our fleet and is particularly important at times when other areas are difficult to fish due to inclement weather. The existing MPA is the result of the initial network development stakeholder process and reflects a thoroughly considered decision balancing interests to achieve all of the network goals. The Department recommendation to deny the petition reflects the strength and prescience of that decision.

While the Ocean Protection Council (OPC) recommendations suggest a smaller extension of the MPA as a compromise it fails to consider several important factors. The current MPA was reached to balance a variety of interests (ecological and socioeconomic) as part of the initial rigorous scientific, stakeholder planning process. It is structured to achieve ecological goals while minimizing socioeconomic impacts. Approving the petition (even with the OPC's suggested compromise) will upset that balance by closing areas important to our fleet.

Further, the scientific basis for the extension relied on by the OPC is admittedly highly precautionary and somewhat speculative. It is predicated on two premises: that climate change would deplete the kelp in the area (which has to date shown resilience) and that the MPA would be sufficient to overcome that depletion. The Department evaluation questions the basis for the petition, particularly the use of an MPA as the best strategy to support kelp persistence.

Also, the OPC recommendation, by its own terms, did not take a comprehensive view of the petition by failing to consider socioeconomic impacts. By ignoring those impacts, it cannot ideally balance the interests at stake. The compromise does not consider whether the extension of the MPA into areas incapable of supporting kelp (i.e., the soft bottom areas where our fleet fishes) would best serve the intended kelp resiliency purpose. Nor did it consider whether a different compromise (excluding those areas) might reduce the socioeconomic impacts. With our fleet's inability to fish areas suitable for kelp, it is likely that acting on the OPC recommendation would not ideally define the MPA, exacting a greater cost than needed, while possibly not achieving the greatest potential benefit.

As the Department's evaluation points out, the petition not only expands boundaries "without clear scientific justification" needed to "advance Goals 1,2, or 4" but also "introduces new conflicts with Goals 3, 5, and 6 by discounting prior planning decisions, imposing socioeconomic impacts, and relying on inconclusive evidence" for its stated benefit. We ask that you deny this petition (including the OPC proposed compromise).

- 1 Cabrillo, 3 South Point, 4 Gull Island, 6 Natural Bridges, and 7 Pleasure Point

These proposed expansions all include high value squid harvest areas of significant importance to our fleet. Their current design reflects careful consideration of those impacts during the initial development of the MPA

network. The expansions proposed in the petition (particularly the expansion at Gull Island) would negatively impact our fleet, upsetting the balance achieved in the current network. We support the recommendations of the Department and the OPC to deny these petitions.

Petition 2023-34MPA_2 and _3 Farnsworth Onshore and Offshore

The proposed change in permitted uses in the Farnsworth area would eliminate squid fishing in a highly productive area and would be very harmful to the fleet. The existing regulations recognize our gear's compatibility with a high level-of-protection and were developed as part of the network to appropriately balance the ecological protections of MPAs with socioeconomic impacts. The Department evaluation suggests the petition's rationale – a need to address enforcement issues arising from regulatory confusion – is misguided and that any compliance issues can be addressed by non-regulatory measures. Most importantly, that evaluation also states that the proposed change is unnecessary to achieve the ultimate goal of protecting hard bottom structure, as long term monitoring indicates no decline. The proposed regulation change would severely disrupt that balance achieved in the networks original development to the great detriment of our fleet. We strongly support the recommendations of the Department and the OPC to deny these petitions.

Additional petitions

Other petitions that limit fishery access will also affect our fleet by decreasing opportunities in areas that we have targeted squid or other coastal pelagic species in recent years. These include but are not limited to:

Petition 2023-23_AM Modify four MPAs near Monterey, and designate new MPA at Tanker's Reef
Petition 2023-24_AM Expand Laguna Beach notake SMCA into Dana Point SMCA
Petition 2023-32_AM Amend Duxbury Reef SMCA

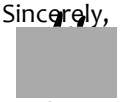
We rely on the general comments above and the Department's evaluations for our support of the Department's recommendations with respect to these petitions.

Conclusion

The proposed MPA expansions and regulatory changes that preempt our fleet's fishing all come at a cost, not only to our fleet, but also to the processors, support industries, crew, workers, and communities that depend on our fisheries. We are very concerned by the limited analysis of these impacts in consideration of these petitions. We believe that the Department's evaluations provide the best and most complete consideration of these impacts and also the most thorough analysis of the potential for these petitions to achieve the goals of the Marine Life Protection Act and the 2016 Master Plan for MPAs; therefore, we support the Department's recommendations.

Thank you for your consideration.

Sincerely,



Mark Fina
Executive Director

MARINA del REY SPORTFISHING, Inc.
13759 Fiji Way · Marina del Rey · CA 90292 · 310 822 3625

27 September 2026

Re: Expansion of MPA's; October 2026 FGC Meeting.

Esteemed Commissioners,

Marina del Rey Sportfishing, Inc, whose Six Racially, Ethnically and Gender Diversely owned Public and Private CPFV's* who'll annually carry upwards of 40,000 persons of all walks of life, from the world around on Sportfishing and Whale Watching trips, as well as Marina del Rey Bait Company , charged with keeping these Party Fishing Boats and the Hundreds of Private Boaters who use MdR to launch, supplied with bait,

Wholeheartedly OPPOSE Any Expansion

…of specifically Point Dume and Point Vicente MPA's, which lie within our typical Area of Operation and Negatively Impacted our operations since their inception , but includes Any and All other MPA as well.

Marina del Rey Sportfishing has Long been a Pioneer in Ethical and Conscientious Sportfishing practices, preaching and teaching Catch and Release, Take just what you need, Don't waste the resource since Long Before these became generally popular.

We can Unhesitatingly say that we have seen Nothing Whatsoever Changed since the original MPA implementation, beyond Depriving the Citizens of California and their neighbors from all over who use our services, the chance to fish and reap the benefits of the Once Popular and Productive now Closed areas….

Feel Free to contact me,

Sincerely,



Rick Oefinger, President
310 372 3712; RICK@MDRSF.NET

*Betty O, Free Spirit, New Del Mar, Spitfire, Tortuga and Tourist comprise the MdRSF CPFV Party Boat fleet…

Monterey Bay Aquarium

September 28, 2026

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 942440-2090

Submitted electronically to fgc@fgc.ca.gov

RE: Bin 2 Marine Protected Area Regulation Change Petitions – Support for Strengthening California's MPA Network

Dear President Sklar, Vice President Anderson, and Honorable Commissioners:

Thank you for the opportunity to comment. On behalf of Monterey Bay Aquarium, I write to respectfully urge the Commission to approve only those petitions that strengthen California's Marine Protected Area (MPA) Network. We strongly support adaptive management decisions that are supported by the best available science and the precautionary principle, consistent with upholding the Network's integrity, effectiveness, and long-term conservation goals.

California's MPA Network is an investment in the long-term health of our state's ocean ecosystems, and its success depends on maintaining a connected network of strong statewide protections. Monterey Bay Aquarium supported the creation of the MPA Network through the Marine Life Protection Act planning process by contributing scientific information and expertise on marine species and habitats, raising awareness about the process among coastal communities, and encouraging public participation. Since then, scientists have studied the Network's performance, with evidence suggesting that MPA effectiveness is positively correlated with age and higher levels of protection. The latest science and CDFW's Decadal Management Review show that the relatively young Network is working as intended but needs more time. CDFW concluded that we are still in the early stages of understanding the many long-term ecological benefits provided by the MPA Network.

Meaningfully protecting marine ecosystems is an important part of building ecological resilience to the intensifying stressors affecting our ocean–from prolonged ocean warming and expanded domoic acid outbreaks to kelp loss and pollution. These growing pressures make it increasingly important to preserve the strength of protections already in place. With this in mind, Monterey Bay Aquarium strongly supports OPC's precautionary approach and recommendations to strengthen the MPA Network. Unless available scientific evidence

Monterey Bay Aquarium

establishes that a proposed change would strengthen the Network and advance the goals of the MLPA, maintaining existing protections while continuing to monitor provides an opportunity to learn without unnecessarily diminishing the Network's conservation benefits.

We urge the Commission to use this opportunity to build on California's investment in the MPA Network and ensure that any changes strengthen its ability to protect ocean ecosystems over the long term.

Thank you for considering our comments and for your continued leadership in protecting California's marine resources.

Sincerely,

Aimee David
Vice President, U.S. & California Ocean Conservation
Monterey Bay Aquarium

CA ESTUARIES NEED PROTECTION

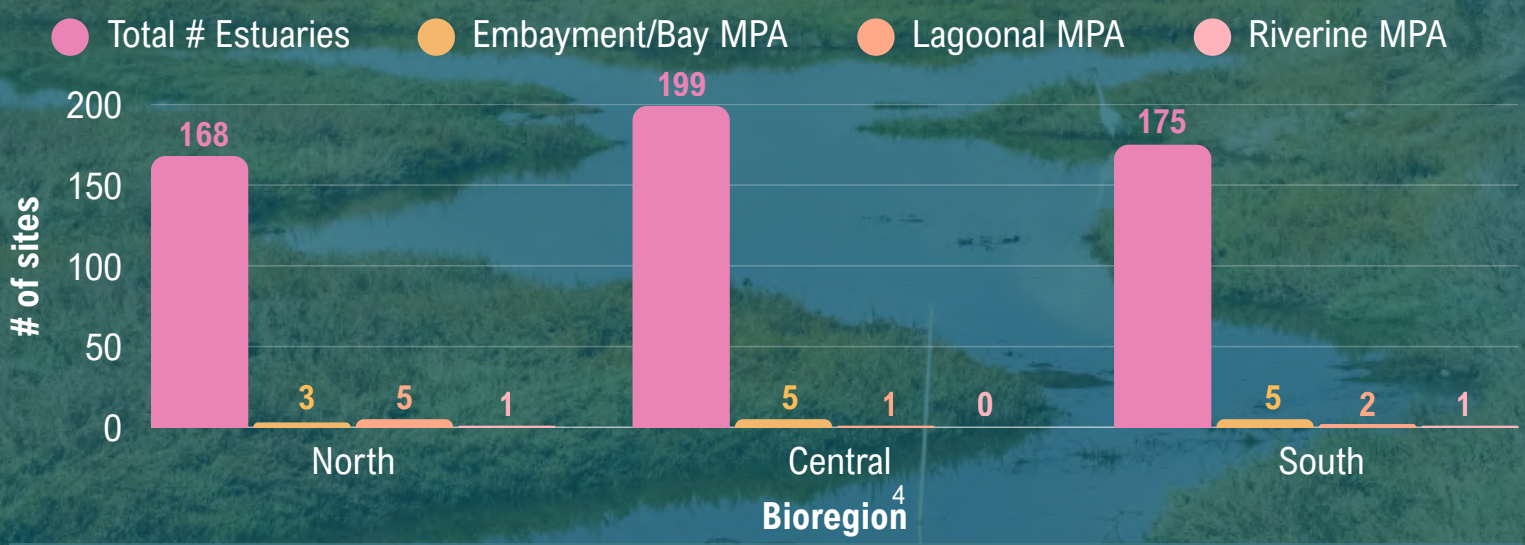
WHY?

Estuaries serve as vital nursery habitat for commercially and ecologically important species, buffer coastlines against flooding, filter land-based pollution, and are home to irreplaceable Tribal cultural resources.[1,2] Despite this, they are the *least protected* habitat type within the Network.

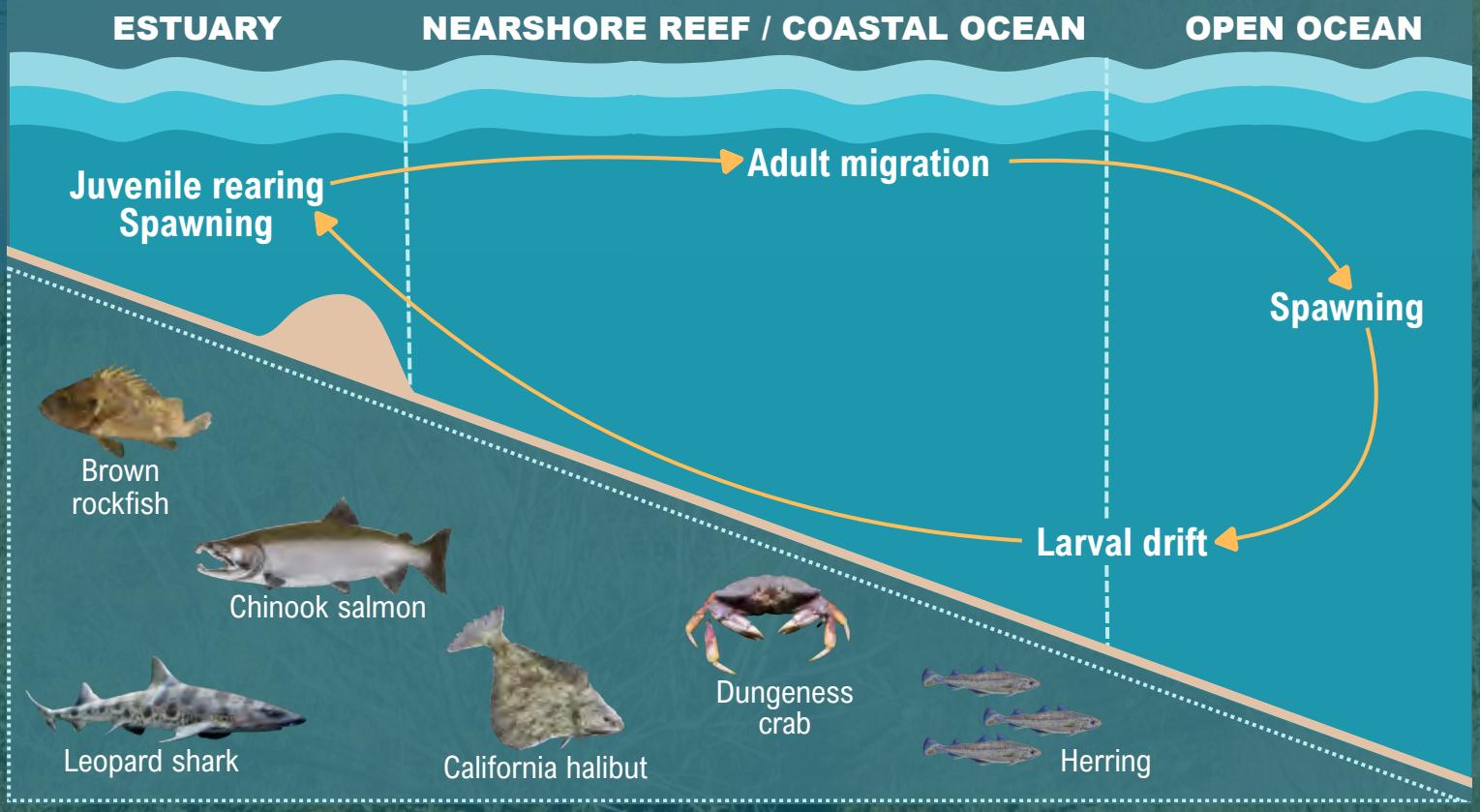
only **12%** of CA's estuaries are protected[3]



Total number of CA estuaries compared to the number of estuarine MPAs



They provide food, shelter, and reduced predation, and are **essential nursery habitats** for the life cycles of many important marine species[2]



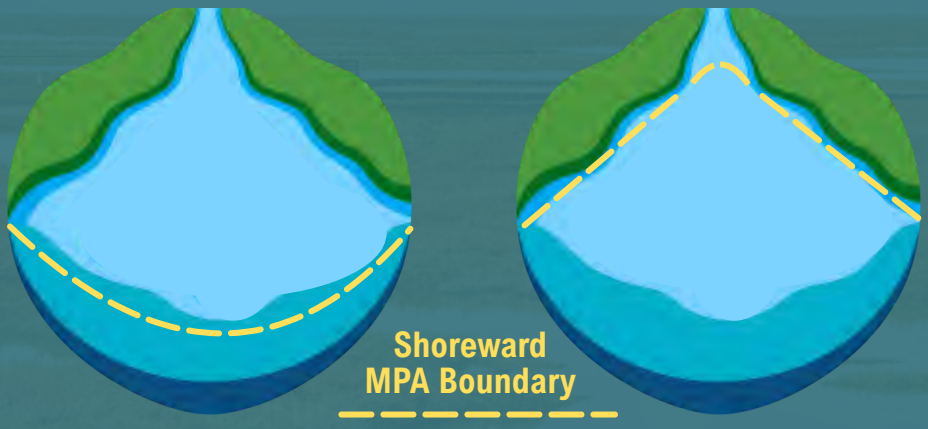
CURRENT NETWORK CHALLENGES

Reality

Partial Protection[5]
Juvenile habitat unprotected

Ideal

Fully-Protected
Full life-cycle protected



Water quality is <u>not</u> protected[5]



Estuarine protection <u>rarely</u> meets the replicate guidelines[3]

Minimum 3 | Recommended 5

North Coast
4 replicates

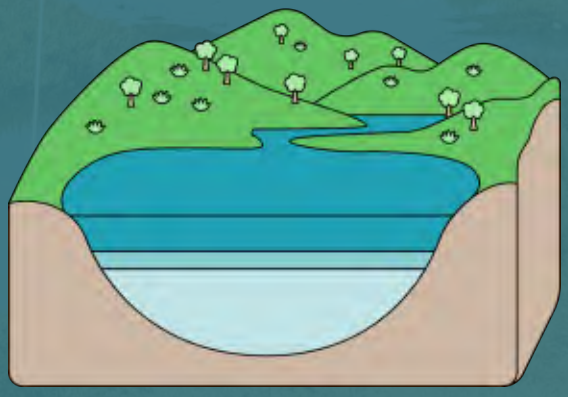
Central Coast
3 replicates

South Coast
3 replicates



Spacing between replicates exceeds 62mi in most regions

Land-sea connections could be improved in MPA sitings[5]



NETWORK OPPORTUNITIES

1.Protect whole estuaries

The SAT recommended protecting entire estuaries where possible. Most estuarine MPAs (eMPAs) protect a portion of the mouth, leaving upstream habitat and land-sea connections exposed.

2.Close spacing gaps

Spacing between eMPAs exceeds 62mi in multiple locations, which violates the SAT's spacing guidelines and leaves critical linkages unprotected.

3.Add Water Quality Protections

Watershed health and sediment inputs fundamentally determine eMPA effectiveness, yet adjacent land-use evaluation and water quality protections are absent.

4.Recognize climate urgency

Sea level rise and altered hydrology directly threaten estuary habitat. Protecting a full range of estuaries, including climate refugia, is essential for species across their life cycles

References

1. Sanctuary Integrated Monitoring Network. (n.d.). Estuaries: Overview. https://sanctuarysimon.org/regional-nms/estuaries/
2. Hughes, B. B., M. D. Levey, J. A. Brown, M. C. Fountain, A. B. Carlisle, S. Y. Litvin, C. M. Greene, W. N. Heady and M. G. Gleason. 2014. Nursery Functions of U.S. West Coast Estuaries: The State of Knowledge for Juveniles of Focal Invertebrate and Fish Species. The Nature Conservancy, Arlington, VA. 168pp.
3. CDFW. 2026. Science Guide to California's MPA Network.
4. Central Coast Wetlands Group. 2015. California Coastal Confluence Inventory.
5. Stein, E.D., Walker, J., O'Connor, K., Clark, R., Whitcraft, C. 2023. Development of a Statewide Estuary Monitoring Program to Evaluate California's Estuarine Marine Protected Areas-Estuary Marine Protected Area Program Overview. A report prepared for the California Ocean Protection Council and the California Department of Fish and Wildlife. 12pp.

Contact:
rikki@californiamsf.org
ella@californiamsf.org

CMSF CALIFORNIA MARINE SANCTUARY FOUNDATION

Designed by Ella Merkle

PROTECTING CA'S KELP FORESTS

WHY?

Kelp are foundational species whose forests create important marine habitats for a range of species and provide numerous ecosystem benefits[1]:



- Provide critical foraging, rearing, and nursery habitat for many ecologically and economically important species
- Provide oxygen and store CO_2
- Protect shorelines by buffering waves
- Improve water quality, yet

90% of CA's kelp has disappeared.

WHAT'S HAPPENING? 2 MAJOR COLLAPSE PATHWAYS

HEALTHY KELP FOREST → **MARINE HEAT WAVE** → **THERMAL STRESS** → **LOSS OF KELP CANOPY**

HEALTHY KELP FOREST → **LOSS OF URCHIN PREDATORS** → **INCREASE IN URCHIN POPULATION** → **URCHIN BARREN**

These pathways can overlap, worsening impacts[2]

ACTIONS FOR CA'S KELP FORESTS

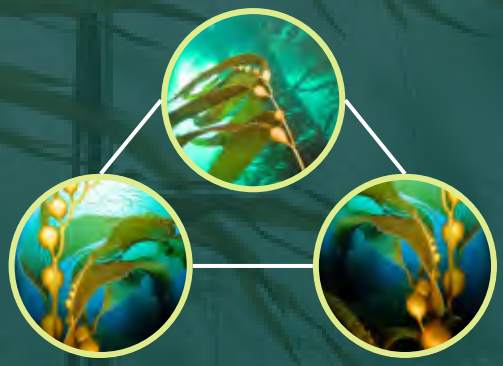
BENEFITS OF MARINE PROTECTED AREAS



1. Increase species biomass[3]



2. Preserve trophic interactions[4]



3. Provide insurance against climate disturbances via habitat redundancy[5]

4. Protect entire ecosystems[3]

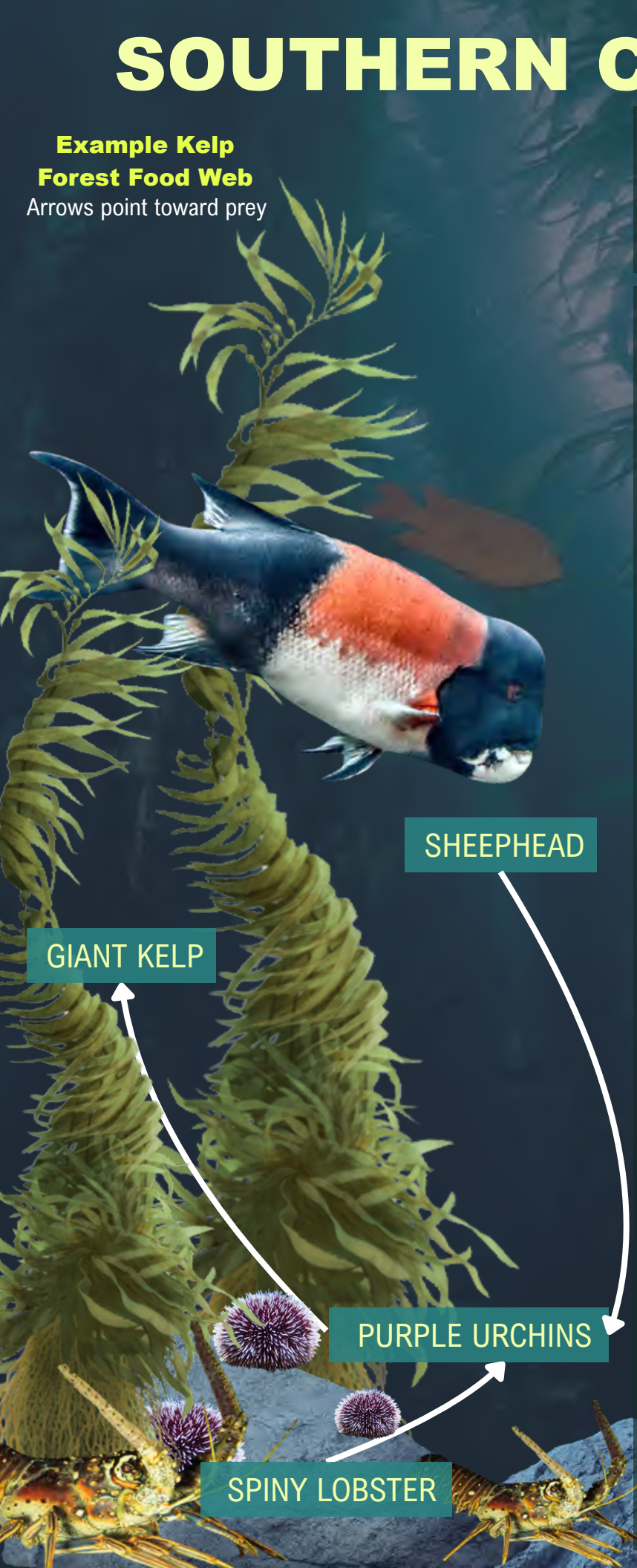


ACTIONS TO PROTECT KELP VARY BY REGION

Actions	Key Mechanisms	Regions
Protect Climate Refugia	**MPAs:** Strengthen/maintain protections for resilient areas[6,7]; Build insurance via redundancy[5]	Southern, Central, Northern
	Non-MPAs: Improve water quality via area of special biological significance (ASBS) designation	
Build Resilience	**MPAs:** Protect urchin predator communities[4]	Southern
	Non-MPAs: Improve water quality via ASBS designation	
Active Intervention	**MPAs & Non-MPAs** (depending on regulations): Targeted urchin removal; Reintroduce urchin predators (sunflower seastars and sea otters)[8]	Northern

SOUTHERN CALIFORNIA

Example Kelp Forest Food Web
Arrows point toward prey



Collapse Pathway:
Marine Heatwave + Loss of Urchin Predators

- 20-40% of kelp canopy remains[9]
- Kelp canopy primarily impacted by thermal stress from marine heat waves
- Kelp recovered 75% faster,[10] and biomass was 5x higher[4] inside MPAs compared to similar open access areas; linked to presence of urchin predators

Recommended Actions:

Build Resilience

- Protect urchin predator communities with MPAs

Protect Climate Refugia

- Maintain and strengthen protections for resilient kelp populations inside MPAs
- Build insurance via habitat redundancy in MPAs
- Improve water quality

CENTRAL CALIFORNIA

Collapse Pathway:
Marine Heatwave

- 30-60% of kelp canopy remains[6]
- Kelp communities persist in Central Coast aided by persistent upwelling, cold-water conditions, and sea otters keeping urchin populations at bay[4]

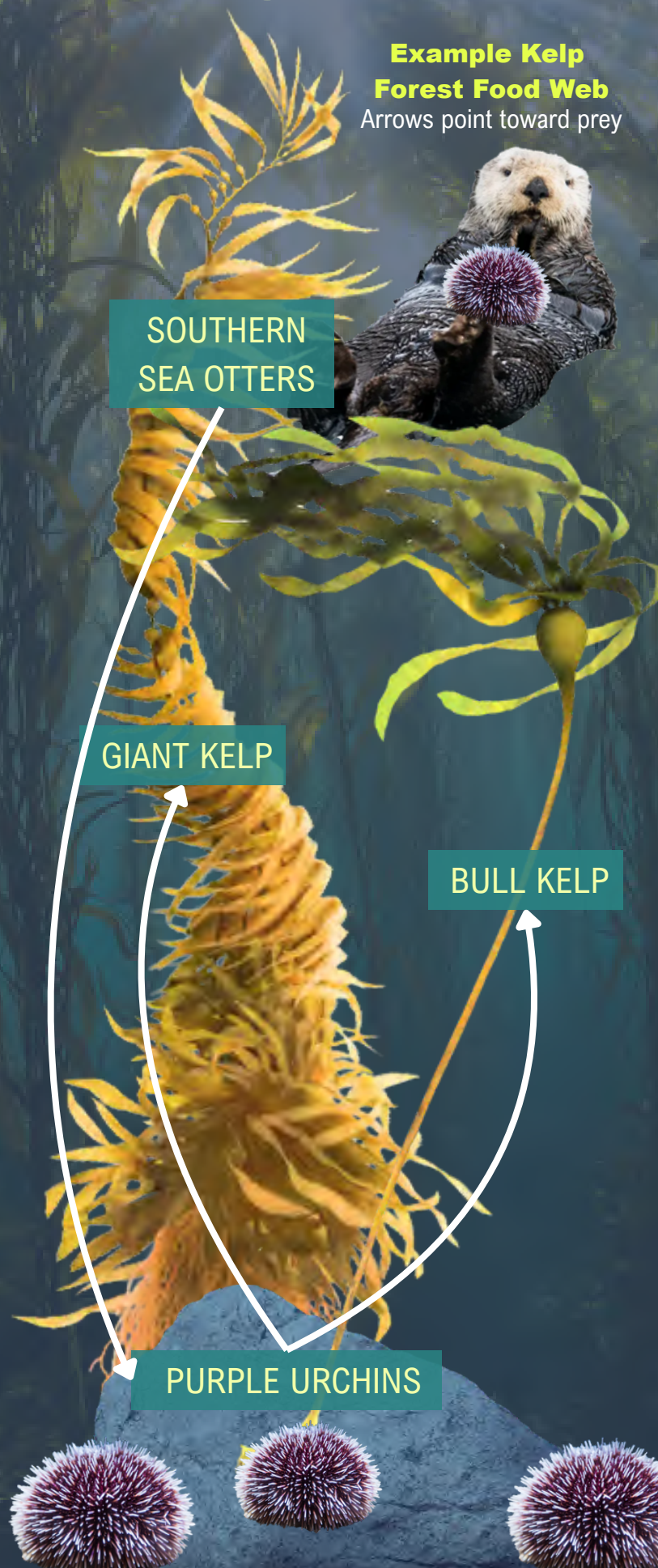
Recommended Action:

Protect Climate Refugia

- Maintain and strengthen protections for resilient kelp populations inside MPAs
- Build insurance via habitat redundancy in MPAs
- Improve water quality

Active Intervention

- Reintroduce sunflower sea stars



NORTHERN CALIFORNIA

Example Kelp Forest Food Web
Arrows point toward prey



Collapse Pathway:
Marine Heatwave
+
Loss of Urchin Predators

- <5% of bull kelp remains[9]
- Seastar wasting disease has decimated sunflower seastars
- Without sunflower seastars, purple urchin have exploded; North Coast kelp forests have transitioned to urchin barrens[11]

Recommended Actions:

Protect Climate Refugia

- Maintain and strengthen protections for resilient kelp populations inside MPAs
- Build insurance via habitat redundancy in MPAs
- Improve water quality

Active Intervention

- Targeted urchin removal and reintroduction of predators

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CMSF CALIFORNIA MARINE SANCTUARY FOUNDATION

Designed by Ella Merkle

COASTAL CONSERVATION ASSOCIATION | CALIFORNIA

September 28, 2026

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

Re: October 13-16, 2026 Commission Meeting - 2023 Marine Protected Area Bin 2 Petitions

Dear President Sklar and Members of the Commission:

The Coastal Conservation Association of California respectfully requests the Commission adopt the California Department of Fish and Wildlife's complete petition-specific recommendations for the 2023 Marine Protected Area Bin 2 petitions. CDFW's recommendations appropriately distinguish between actions that lack adequate support for new restrictions or boundary changes and the narrower measures, research, permitting, enforcement, and co-management pathways that warrant further work. This approach protects the integrity of California's MPA Network and the legal requirements established by the Marine Life Protection Act (MLPA) while honoring the State's commitments to conservation, tribal stewardship, and sustainable, avocational fishing access.

There are several petitions currently before the Commission that CCA California has supported throughout the process, but that CDFW staff scientists have recommended denying. Despite our opinion that these petitions could potentially result in a net positive for coastal conservation and sustainable fishing access, CCA California fully supports the Department's final science-based recommendations. This recommended action reflects a compromise grounded in the best available science, established law, and socio-economic equity across various user groups.

CCA California Recommendation

California has a young MPA Network and a newly established adaptive-management process stemming from the state's recent Decadal Management Review, which notably did not call for specific network expansions or new fishing restrictions. Instead, it recommended using the Review's findings and best available science to evaluate any proposed changes to individual MPAs, the Network, or the Management Program. Adaptive management is not a presumption that additional closures necessarily equate to greater conservation benefit; it is a disciplined process of identifying a defined management need, evaluating relevant science and monitoring, considering practicable alternatives and their effects, and selecting an action supported by the record that advances the applicable MPA and Network objectives.

CCA California therefore asks the Commission to:

- Adopt CDFW's petition-specific recommendations, including denials, limited approvals in concept and nonregulatory actions identified in the Department's evaluations.
- Decline to advance a closure, boundary expansion, or new restriction when the evaluation does not demonstrate a site-specific conservation need, a credible connection between the identified concern and the proposed action, and an expected benefit that justifies the implementation and access effects.
- Decline to advance petitions proposing new MPAs that allow only select methods of take, such as shore-based fishing, unless the record includes a clear, site-specific analysis explaining why comparable low-impact methods are excluded and why the stated conservation objectives cannot be achieved while allowing those alternative methods under appropriate safeguards.

- Apply the Master Plan as the statutory decision-guiding framework, and ground any decision to change the Network in the Commission-approved evaluation framework and the Department's technical analysis.
- Advance narrowly tailored actions that respond to an identified resource concern while supporting legally workable pathways for Tribal co-management and stewardship, consistent with CDFW's evaluation.
- Favor research, monitoring, enforcement, restoration, permitting, and the full suite of species-specific fisheries-management tools where they address the stated concern more directly or where material uncertainty remains.

The Legal and Policy Framework for MPA Decisions

The MLPA establishes the conservation purposes of the MPA Program while requiring clearly defined objectives, sound scientific guidelines, effective management, adequate enforcement, and management of MPAs, to the extent possible, as a network. Fish and Game Code section 2855 provides that the Commission *shall* adopt a Master Plan that guides implementation of the Marine Life Protection Program and decisions concerning new MPAs and major modifications of existing MPAs. The same section requires that the Plan be based on the best readily available science and developed with fisheries participants, conservationists, scientists, and other interested persons. The Master Plan is therefore the decision-guiding framework for major MPA actions, not merely background to a separate policy process.

The MLPA requires each MPA to have identified goals and objectives and directs that individual MPAs and the Network have the appropriate size, number, type of protection, and location to meet those objectives and the MLPA goals. Fish and Game Code section 2861 requires the Commission to consider petitions, favoring those compatible with the MLPA goals and guidelines. These provisions call for petition decisions that are specific to the proposal and grounded in the needs of the Network, not a general preference for more or less protection without clear rationale, nor deference to a precautionary approach.

The broader Marine Life Management Act reinforces this balanced approach and directs the State to conserve, sustainably use, and where feasible restore marine living resources. It recognizes the economic and cultural importance of sustainable recreational and commercial fisheries, requires use of the best available scientific and other relevant information, and calls for participation by fishing, conservation, scientific, tourism, and public interests.

CDFW Evaluations and the Master Plan Should Guide the Commission

CDFW's evaluations provide the most complete technical basis for the Commission's petition decisions. The Department applied the Final Evaluation Framework adopted for the 2023 Bin 2 process, which directs consideration of the MLPA, MPA objectives and design, the Decadal Management Review, climate resilience, feasibility, equity, tribal interests, fisheries, enforcement, and socioeconomic effects. The evaluations also identify where a petition can be addressed more effectively through a limited or non-regulatory alternative.

The 2016 Master Plan and the first Decadal Management Review support this approach. Together, they call for monitoring, evaluation, long-term enforcement capacity, improved tribal coordination and co-management, attention to access and human dimensions, and a stronger understanding of MPA effects on fisheries and stock sustainability. They do not establish a presumption that every petition seeking expanded protection should be approved.

CCA California appreciates the Ocean Protection Council's important policy role in advancing biodiversity, climate resilience, Tribal stewardship, and ocean health, and we welcome OPC's participation in the process, including staff participation in the development of the Commission-approved evaluation

framework for these petitions. There are numerous petitions where CDFW, OPC & CCA California all agree on the same recommendations, and we encourage the Commission to deny those petitions expeditiously. However, when evaluating OPC policy recommendations that differ from the Department's technical evaluation, the Commission should ensure that its action remains grounded in the Master Plan, the Commission-approved evaluation framework, the applicable MPA objectives, and an analysis of socioeconomic impacts to the communities who would lose access under the proposals.

Integral to the establishment of the original MPA Network, was a collaborative process that developed MPA regulations guided by scientific recommendations, stakeholder input and analysis of socio-economic impacts. CCA California and partner organizations elevated the lack of socioeconomic data in the Decadal Management Review process and strongly encourage any recommendations for adaptive management of the Network to include this critical information. Petitions developed outside of a stakeholder-driven process, that lack meaningful socioeconomic analysis, and that will significantly restrict fishing access without a clearly identifiable fisheries management threat, should be denied and returned to the drawing board to maintain maximum support for the MPA network.

Comprehensive Analysis and Low Impact Access

OPC staff indicated that their evaluations did not analyze alternative methods of take or provide a rationale for supporting proposals that preserve shore-based fishing while excluding other comparable methods of take. These are important considerations for a decision process governing a statewide network of MPAs.

CCA California is not asking that every method of take be authorized in every limited-take MPA. Rather, we wish to ensure that where a proposal would preserve one "low-impact" shore-based opportunity or form of harvest while excluding comparable methods, the basis for that distinction should be transparent, site-specific, and tied to the ecological, biological, or enforceability issue the action is intended to address.

This is also consistent with the way OPC has utilized the MPA Guide and Marine Protection Atlas in its evaluation of 30x30 benchmarks and levels of marine ecosystem protections. The Guide describes a "Highly Protected MPA" as allowing only "light extractive activities with low total impact". Its expanded guidance identifies examples of highly selective, low-impact gear types that may be compatible with that level of protection, including:

- cast nets and intertidal hand capture or gleaning;
- single lines, including hooks, pole and line, rod, and troll;
- free-diving spearfishing;
- lobster, octopus, and crab traps; fish traps used over soft-bottom habitat; and hand dredges for bivalves; and
- low-impact traditional extraction.

The MPA Guide does not replace California's statutory framework, and a general classification cannot resolve site-specific management questions. However, this resource is helpful to underscore the need for having a clear explanation for treating comparable methods of take differently when considering new MPAs. Without that explanation, a restriction may appear unnecessarily selective, difficult for affected communities to understand, and likely to disproportionally impact certain user groups and communities.

Applying the Framework to the Pending Petitions

CDFW's recommendations are appropriately nuanced. The Department recommends denying the petitions that would expand closures, reduce allowable take, or otherwise alter the Network without adequate support under the framework. At the same time, it supports or identifies tailored pathways for certain actions, including tribal co-management and stewardship arrangements where administratively feasible; the

narrow true-smelt action at Pyramid Point; regulatory clarification and enforcement improvements; kelp-restoration work through existing or developing permitting pathways; and retaining fishing opportunities around Duxbury reef. It should be noted, however, that this area around Duxbury reef has been identified as Potential Wilderness, and we encourage the Commission to exercise caution with approving any regulatory change to ensure that any management actions do not trigger a broader shift in land management or a restriction to boat access across the region.

Conclusion

The Commission has the opportunity to demonstrate that California's MPA Network can be both durable and responsive: protective of marine ecosystems, grounded in the best available information, attentive to tribal and local knowledge, workable for enforcement, and respectful of sustainable recreational access. The most durable path is to follow the framework already adopted by the Commission and the petition-specific recommendations developed by CDFW.

CCA California respectfully requests that the Commission adopt CDFW's complete recommendations for the 2023 Bin 2 petitions. Where CDFW supports a tailored action or an alternative pathway, the Commission should direct the Department to pursue that work consistent with applicable legal and administrative requirements.

Respectfully,

Devin O'Dea
Executive Director
Coastal Conservation Association of California

PCFFA PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS

September 28, 2026

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
Via email: fgc@fgc.ca.gov

RE: Agenda Items 26–39 – Bin 2 Marine Protected Area Petitions, October 14–16, 2026

Dear President Sklar 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.

California fisheries operate within one of the most highly regulated and actively managed systems in the world and provide a domestic food source that should be protected and prioritized. MPAs are one tool, not a substitute for fisheries management. The California MPA network is comprehensive and was developed through a structured public process. Before considering changes, especially those with the consequences associated with additional commercial fishing closures, the Commission should evaluate whether existing targeted management measures are already addressing the asserted underlying issues in these petitions.

As the Commission prepares to act on the remaining 2023 petitions, PCFFA respectfully asks the Commission to:

- Close out this petition cycle by denying petitions that would create new or expanded closures, consistent with the Department's recommendations**.**
- Adopt the Department's recommended alternative pathways to advance tribal goals outside of the MPA petition process.
- Direct that any future changes to the MPA network move through a transparent, science-based adaptive management process that includes full socioeconomic analysis and meaningful consultation with the fishing communities affected.

At its core, the current petition process has been fragmented and inconsistent, lacking a cohesive statewide framework and a clear, science-based standard applied across proposals. Over the course of multiple Commission meetings, regional public hearings, Tribal Committee discussions, agency letters, and petition revisions, one fundamental issue remains unresolved: the public, and particularly the California fishing communities most directly affected, still do not know what decision-making standard is being applied to determine the approval or denial of these petitions.

On June 25, 2026, PCFFA and a coalition of commercial fishing organizations from across the state submitted a formal request for clarification on the standards, process, and agency roles governing these decisions, and asked for written responses before any further Commission action. Those questions have not been answered. Since that letter, the Ocean Protection Council has issued recommendations that diverge from the Department's on several petitions, which makes the question of how the Commission will weigh these inputs more pressing, not less.

Lisa Damrosch • Executive Director • lisa@pcffa.org • 650-255-2063 •
www.pcffa.org

The Department has now confirmed the core concern fishing communities have raised throughout this process. In its evaluations, the Department states that the Commission's petition process does not offer the level of engagement and in-depth analysis required by the Marine Life Protection Act and the Master Plan for siting new MPAs. It also notes that a full analysis of socioeconomic and fiscal impacts was outside the scope of this process, and that the Decadal Management Review did not indicate that changes such as new MPAs were necessary to improve network performance.

The Department is the State's scientific and technical authority on these issues, and its analysis should carry that weight and serve as the framework and baseline for the Commission's review. 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. The required consideration of impacts to fishing communities has not been meaningfully applied, which is inconsistent with the Marine Life Management Act and the Commission's Coastal Fishing Communities Policy. PCFFA will always speak strongly against any policy or regulation changes that are not based on science, and that do not adequately balance domestic food production with ocean protection.

Tribally Led and Co-Led Petitions

We recognize the importance of Tribal stewardship and the cultural connections between Tribal communities and marine resources. We support collaborative approaches to co-management where they are grounded in meaningful engagement, sound science, and transparency.

The Department has identified alternative pathways for several of these petitions that could address the petitioners' purposes without changes to the MPA network. The Department notes that co-management agreements can be established with tribes at any time without action through the Commission's petition process or rulemaking. It also recommends exploring State Marine Cultural Preservation Areas, which recognize the cultural significance of an area without restricting existing fishing access. Any State Marine Cultural Preservation Area should be designated as a standalone designation, not layered on a new MPA, and should confirm that existing fishing access and gear types remain allowed.

Our comments below are limited to actions that would affect commercial fishing access.

Petition 2023-19 (Chitqawi): PCFFA supports the Department's recommended alternative pathway and opposes the establishment of a new SMCA.

Petitions 2023-20 and 2023-34 (Point Buchon): PCFFA opposes the proposed northward expansion of the Point Buchon SMR boundary in Petition 2023-20, consistent with the Department’s recommendation to deny. PCFFA also recommends denial of Petition 2023-34, which would convert Point Buchon SMCA to a reserve and end fishing opportunity that must be maintained to support our coastal communities.

Petition 2023-28 (Point Sal): The Department did not provide a single recommendation on this petition and instead offered the Commission several options. PCFFA recommends denial. PCFFA could potentially support exploring a State Marine Cultural Preservation Area consistent with the conditions above but strongly opposes any option that would establish a new MPA or Special Closure at Point Sal.

Petition 2023-29 (Mishopshno): PCFFA supports the Department's recommended alternative pathway and opposes the establishment of a new SMCA.

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Other Petitions

PCFFA recommends denial of Petition 2023-23, Petition 2023-24, Petition 2023-27, Petition 2023-32, and Petition 2023-33 because they restrict or reduce access to active commercial fishing grounds and displace fishing families without meeting the standard required to justify additional closures.

Adaptive management should also include adjustments in both directions. Evaluation must lead to decisions about whether MPAs should be maintained, modified, reduced, or if grounds should be reopened or removed based on whether they are meeting clearly defined objectives. PCFFA supports Petition 2023-14 and Petition 2023-16, which would improve commercial fishing access and are consistent with sustainable use of these areas. PCFFA also supports the access-enhancing components of Petition 2023-15 and Petition 2023-18 where those components maintain or expand commercial fishing opportunity without introducing new restrictions.

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. PCFFA supports ocean protection measures grounded in the best available science, focused on clearly defined problems, and appropriately matched to those problems.

We urge the Commission to close this petition cycle by denying petitions that would create new or expanded closures, consistent with the Department's recommendations. Tribal goals should advance through the pathways the Department has identified, and the Commission should ensure that any future changes to the network are rooted in science and based on demonstrated need and measurable outcomes, not assumptions, precautions, or optics.

Thank you for your time and consideration.

Sincerely,
Lisa Damrosch
Executive Director
Pacific Coast Federation of Fishermen's Associations

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September 29, 2026

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

Submitted via email to fgc@fgc.ca.gov

RE: Bin 2 Marine Protected Area (MPA) Regulation Change Petitions

Dear Commissioners,

We offer this letter as a consolidated summary of Fish On's verbal comments from the MPA Regional Hearings in April and May of 2026 to support your decision-making process. The undersigned individuals have affirmed that Fish On's approach resonates with their values, and have added their names in support of these science-based, community-informed recommendations for updating California's Marine Protected Areas.

As a reminder, these positions reflect extensive community input from anglers and spearfishers across California and are rooted in our guiding principles of 1) Equity and Environmental Justice, 2) Climate Resilience and 3) Science and Understanding of our coast and its communities.

Fish On's Guiding Principles

1. *Equity and Environmental Justice*

Many communities, including Tribes, those that fish, and others who enjoy the ocean, were not considered when the MPAs were designated. Environmental justice is supposed to be a core component of the adaptive management decision-making process which, for all intents and purposes, was de-prioritized by the Department and ultimately overlooked the systemic harm and inequities in ocean management[1] that Marine Protected Areas should work to correct. We submitted a letter[2] imploring the Commission to lay a path forward that prioritizes equitable access, builds accountability into decision-making, centers marginalized communities, and uses MPAs as a tool to repair—not reinforce—systemic imbalance. Our positions reflect meaningful pathways within the current petition process to advance equity and environmental justice.

[1] https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2024.1478023/full
[2] Letter to FGC dated April 2, 2026: Meaningfully advancing justice, equity, diversity and inclusion through adaptive management of California's MPA Network; RE: Agenda Item 2. Evaluations and Recommendations for MPA Petitions

Fish On is founded, run and informed by our community of anglers and spearfishers. We are funded by grassroots support from fishers who believe in our mission, in addition to small grants which we solicit to support our programming. As our fiscal sponsor, Earth Island Institute receives a small percentage of the funds we raise to provide us backbone support. This allows us to make the most efficient use of generous contributions by sharing core functions like human resources and accounting teams with other organizations under the Earth Island umbrella.

2. *Climate Resilience*

Climate change was not explicitly considered in the design of the current MPA Network and—like equity and environmental justice—was supposed to be a key component of the Department's evaluation of the MPA petitions but was largely ignored. Given that MPAs were shown to be more resilient to the stresses of the last decade, such as the marine heatwave or "blob," there is a critical need to enhance the Network to protect species and biodiversity through future uncertainties. Particularly with the latest marine heatwave and the pending strong El Niño, this is a critical and timely opportunity to make sure our MPAs can act as our insurance policy. Strengthening the MPA Network for climate resilience also supports more equitable use and recreation for future generations of Californians.

3. *Science and Understanding*

Climate change has also added uncertainty to the little that we do know about our vast and dynamic ocean. MPAs are a living laboratory that can help us understand how marine ecosystems function, and how they are impacted by climate change. This enhanced knowledge supports better fishery management and can help us refine the MPA Network to better serve everyone into the future. The Network should also be seen as an opportunity to reconnect California's Indigenous communities with their native waters, restore Tribal stewardship, and better understand how to incorporate Traditional Ecological Knowledge into MPA management and decision-making. Our positions also reflect the importance of maintaining our existing and long-standing Marine Reserves, while advancing opportunities to help us better understand the ocean and how communities interact with it.

Summary of Position Statements

Agenda item 26: Petition 2023-14MPA: Commercial sea urchin take - Oppose

Applicable to all sites but referenced for Double Cone Rock, Sea Lion Cove and Stewart's Point SMCAs at the North Coast Hearing

We urge you to deny this petition for the following reasons:

This petition is part of a broader, concerning trend. In total, there are currently four petitions before you that would reduce protections across 18 different MPAs. These proposals, including 2023-14, fail to adhere to science-based guidelines, ignore the goals of the Marine Life Protection Act, and directly conflict with the findings of the Decadal Management Review.

Specifically regarding 2023-14, the petition misidentifies the problem. It uses kelp restoration as a justification for commercial use, but purple urchins, the species driving kelp decline, represent less than one percent of commercial landings. Opening the nine SMCAs requested, including Double Cone Rock SMCA, Sea Lion Cove SMCA, and Stewart's Point SMCA, would simply incentivize the harvest of red urchins, which make up 99 percent of landings and are not the primary cause of the barrens. Additionally, urchins collected from barrens would not meet the quality standards to be commercially viable. The petition also provides no supporting evidence about negative impacts on the urchin fishery caused by MPAs nor data on urchin abundance within the MPAs.

Furthermore, this is ecologically counterproductive. A commercial fishery is designed to sustain a population for future harvest, not to restore an ecosystem. We already have better tools, such as Restoration Management Permits, which allow for targeted, scientific removal without compromising the MPA network's integrity.

Finally, this creates significant enforcement challenges for wardens trying to manage complex gear rules. The petitioner's own argument is self-defeating: If populations of urchins in areas outside MPAs are declining, we should not invite that same decline into our protected areas. We urge you to stand with the dozens of organizations opposing this move, follow CDFW's recommendation, and deny this petition.

Agenda item 26 (cont'd): Petition 2023-14MPA: Commercial sea urchin take - Oppose
Applicable to all sites but referenced for Naples SMCA and Anacapa Island SMCA at the Central Coast Hearing.
We reiterate our opposition to this petition based on the lack of supporting evidence to show these MPAs have caused significant harm to the fishery, nor data to show the potential benefit that may come from opening a small percentage of state waters to commercial harvest. Despite comments that this allowance is needed because consumer demand is increasing for uni, fishery limits which are set through fishery management processes will drive the opportunity to respond to market demand.

Agenda item 26 (cont'd): Petition 2023-14MPA: Commercial sea urchin take - Oppose
Applicable to all sites but referenced for Point Dume, Point Vicente (No Take), and Swami's SMCAs at the South Coast Hearing
There is a stark double standard in expectations of stakeholder outreach depending on who is making a proposal. Commissioners and agency staff have repeatedly insisted that groups petitioning to protect areas must perform extensive stakeholder outreach, yet that expectation is not applied to commercial fishing interests proposing to weaken conservation.

The ocean belongs to everyone. And the default framework for decision-making cannot simply be that one user group deserves to profit from an area, and any other user group—particularly those in favor of conservation action, whether related to MPAs or fishery issues—are often seen as not having a legitimate interest in the future of the ocean.

If this Commission expects rigorous outreach, transparency, scientific justification and broad public engagement when protections are proposed, then the same standard should apply when protections are being rolled back. Consistency matters. Equity matters. And public trust in this process depends on both.

Agenda item 27: Petition 2023-23 MPA_AM1: Monterey - No Position
While this proposal offers stronger science and methodology for kelp restoration than the rationale for commercial urchin allowances in Petition 2023-14MPA, piers and jetties are essential for subsistence fishing communities. We could support enhancing protections to

directly benefit pier and jetty fishing, but we cannot support enhancing the protection at Ricketts without a continued exception for hook and line fishing on the north side of the breakwater.

We are wary of proposals for artificial enhancements in the marine environment. With rare exception, we would prefer to see more meaningful, alternate conservation pathways and marine protections over artificial reefs.

Agenda item 28: Petition 2023-33MPA_AM1: Santa Cruz - Support

While the broader petition seeks to expand six MPAs statewide, these comments are site specific for Natural Bridges SMR and the proposed Pleasure Point SMCA.

For Natural Bridges—given that shore-based access is already restricted—expanding this State Marine Reserve will have little negative impact on marginalized fishing communities. And science has shown that recreational fishing could be considerably enhanced if the Reserve is expanded to a meaningful size. We anticipate that shore fishing areas along West Cliff Drive and potentially even around to the wharf could benefit and should be monitored.

For Pleasure Point, the petitioners took our suggestion to make this site an SMCA and allow limited recreational fishing, and we are grateful for the dialogue and compromise. The law that established our MPA Network allows us to take risks and understand what may or may not work for different communities while better protecting our coastal ecology. We see this as an opportunity to balance community needs with the potential to better protect sensitive and threatened habitat. This could be a new model for MPAs to act as recreational parks in urban areas. Particularly in the face of a record heat wave and pending El Niño, we view this as a way to balance community needs with better protection for sensitive and threatened habitat.

Agenda item 28 (cont'd): Petition 2023-33MPA_AM1: Point Conception - No Position

While the comment opportunity was for Pt. Conception, we offered the following as an informational comment for the record and a site specific response to outdated information.

Many communities, particularly those that had more conservation-minded ideals were often subject to harassment and intimidation and their perspectives were missing from the original designation process.

The petitioners *do not* claim that fishing is the cause of kelp loss but as fishers, many of us recognize the impact we can have on an ecosystem. With changing conditions and the lack of inclusion of many communities in fishery management, MPAs are an important tool to limit our impact in key areas to help ecosystems recover and adapt. The science does support that, and that shouldn't be the debate. We're here to learn what future people really want—particularly with some scary things like a marine heatwave with a pending El Niño—and then make a science-based and values-driven decision to get us there and through those pending stresses. Regarding comments that shore access to this area is within a private community and restricted, Assembly Bill 1680 passed in 2019 and mandates that state agencies develop and implement a comprehensive coastal access plan to open up the 8.5 miles of publicly owned shoreline at the private, gated ranch. The co-petitioning organization, Azul, was a sponsor on that bill.

Agenda item 29: Petition 2023-33MPA_AM1: Pt. Dume and Pt. Loma/Cabrillo - Support

While the broader petition seeks to expand six MPAs statewide, these comments are site specific for Pt. Dume and Cabrillo SMRs.

The petitioners took our suggested modifications at both Pt. Dume and Pt. Loma/Cabrillo SMR, which we believe will enhance local and/or nearby fishing opportunities, especially for shore-based anglers.

At Pt. Dume, the expansion coupled with the shore fishing allowance is a compromise that seems worthwhile to us. Especially given that Los Angeles is the largest urban area in the state and the barriers to even visiting an MPA—limited parking, hostile behavior, long hikes and staircases, land subsidence closing roads, etc.—we see this as a needed opportunity to enhance equitable access to our state's underwater parks.[3]

At Pt. Loma, where the Cabrillo SMR is located, the northern boundary was adjusted based on our feedback. By putting a popular shore-fishing area just outside the SMR, we believe it will enhance fishing for these communities, and potentially at nearby pier access points. The expansion would help this site be more aligned with scientific guidelines on effective sizing of MPAs. And given that the nearby MPA at Imperial Beach is closed due to toxic runoff and sewage, this expansion will enhance equitable access to the ocean and protected areas for all ocean-going communities.

Agenda item 30: Petition 2023-21MPA: Pyramid Point - Support

We support the requests put forth in this Tribally-led petition and/or subsequent amendments from formal consultation with the Tribe.

Agenda item 31: Petition 2023-19MPA: Chitqawi / Morro Bay - Support with consideration

We support actions towards environmental justice for California's Tribal communities and support the proposal for a new Tribally co-managed Chitqawi SMCA. We also see value in the model of what could be the potential equivalent of a wildlife corridor on land, but with protection from land to sea with the adjacent state park, ecological reserve, existing state marine reserve and state marine recreational management area. This would add coastal and offshore protections. We do request that the state formally consult with the petitioning Tribe to potentially allow general recreational fishing from the seaward side of the jetty. Piers and jetties are where a lot subsistence fishing is concentrated across the state. It may be helpful for enforcement consistency on both sides of the jetty and offer a continued opportunity for lower income communities who may rely on this site, while maintaining the higher level of protection the Tribe has indicated they want to see happen.

[3] On August 6, 2026 due to severe erosion caused by recent high tides and surf, the Point Dume Beach access road beyond the pay gate remains closed until further notice. https://beaches.lacounty.gov/point-dume-beach/

Agenda item 32: Petition 2023-28MPA_AM2: Point Sal - Support

On behalf of Fish On's community of anglers and spearfishers we would like to express our strong support for the Northern Chumash Tribal Council's proposal for a new SMCA and opportunity to advance Tribal co-management. Our support reflects many of the ecological reasons you have heard, particularly the importance of this area as a larval retention zone. We believe MPAs are a tool to naturally restore and recover important areas of the ocean, and that restoration must include renewed connection with the original stewards of the land and water. We also are supportive of areas that enhance a land-sea connection particularly with the adjacent land area already being protected, and we also appreciate the opportunity for true biodiversity protection within the National Marine Sanctuary.

Agenda item 33: Petition 2023-29 MPA_AM1: Mishopshno / Carpinteria - Support

The MLPA's South Coast process, which included this region, was not inclusive of Tribes; it was well documented that many communities were left out, intimidated, or much worse, and therefore these perspectives were not heard or considered in the original designation process. **Any reliance on past bargaining, which was not formally documented, continues these past injustices and exclusionary practices while also undermining the opportunity for younger and future generations to participate in adaptive management now and going forward.**

We support the proposal for a new Tribally co-managed Mishopshno SMCA. This is an amazing opportunity to honor the historical significance of this area to the Chumash people, allow the Tribal community to return to and reconnect with traditional practices and to integrate these stewardship ideals and ways of knowing into our resource management structure. We also would support extension of Tribal exemptions to all Tribal communities.

This also fills the largest gap in the MPA network, giving many communities in the region the opportunity to actually get to and experience the safety and benefits of our underwater state parks. And by protecting this small but ecologically significant and dynamic area, we see a clear opportunity for enhanced shore-fishing, supporting one of the most under-represented communities in fishery management within the broader fishing community. There are multiple reefs in the offshore area that are frequented by boat-based communities that will remain open, ¼ of the near-shore reef will still be open and likely enhanced for all other fishing activity. We see this as a great opportunity to shift the flow of ocean benefits to communities that have been left out, while also minimizing the *perceived* negative, short term impact, by the subset of the fishing community that maintains power in this setting.

Agenda item 34: no position
Agenda item 35: no position
Agenda item 36 (A): no position

Agenda item 36 (B): Petition 2023-27MPA_AM1: Anacapa Island - Support

There have clearly been differing expectations for this process on what the scope of adaptive management should be. For those that took a conservative interpretation of the adaptive management mandate, this petition offers a tweak with hyper-local evidence and with a clear problem and solution.

Eelgrass loss is a lesser-known but incredibly significant decline in a critical habitat type. Eelgrass meadows are a carbon sink and support the early stage life cycle of many species we enjoy seeing and catching throughout kelp forests. This petition presents a clear problem and solution with site-specific research done by leading scientists on the topic. Eelgrass is able to recover in the ten months out of the year that lobster traps are limited at this site but is quickly lost in the two months when this fishery operates here. We urge you to protect one of the few remaining eelgrass meadows by disallowing hard-bottom gear and anchoring year round.

Agenda item 37 (A): Petition 2023-15MPA_AM2: Channel Islands - Oppose

While we support science-backed opportunities to enhance recreational fishing, the justification here is based on *policy gaps* rather than scientific insight. The broader benefits of maintaining these Reserves—which were originally proposed from within the fishing community itself—to ecological health, scientific study, enhanced fishery management and global MPA best practices outweigh the limited potential benefits of weakening these areas.

The petition lacks supporting data to show that these closed areas have had a significant negative economic impact on the fisheries referenced. There is also no guarantee that all fishing methods proposed within these areas can be selective to only pelagic species; impacts to other species and bycatch are unavoidable. In fact, there's new science from around the world showing evolutionary responses of pelagic species to protected areas and it would be a shame to miss the opportunity to see if that's a benefit here.

For many anglers and spearfishers, Marine Reserves are an opportunity to experience healthier marine ecosystems and understand what our ocean may have looked like historically; we see value in letting species thrive within them and urge you to maintain these Reserves, which are among the state's largest and most effective protected areas.

Agenda item 37 (B): Petition 2023-16MPA: Commercial salmon take - Oppose

California's commercial salmon fishery is only just beginning to emerge from a three-year closure. Although the fishery was recently reopened under specific conditions, weakening protections for a species whose population recently collapsed defies both science and common sense. This is a time for caution and recovery, not for introducing new fishing pressure into critical areas of natural recovery—our fully protected 'no-take' zones. The petitioner also does not provide any data or justification to support the claim that the industry has been harmed by these MPAs.

This petition cites a JEDI recommendation from the DMR in its justification, but we must affirm that **no type of industry, including the commercial salmon fishing industry, is a protected class under any jurisdiction's, including California's, Environmental Justice policy or guidance.** This is an unacceptable misuse of JEDI principles for commercial interests.

Furthermore, this petition directly violates the MLPA's mandate. The law requires us to protect species abundance and sustain depleted, economically valuable populations. Salmon are severely depleted. Opening harvest in these two SMRs, which are the 'backbone' of our network, runs counter to the very purpose of these refuges regardless of the pelagic or localized nature of a species. We'll also note that every experienced fisherman should know that bycatch is an inevitable reality of fishing.

Finally, we must recognize these SMRs as climate refugia. Research shows that fully protected reserves buffer species from the worst impacts of warming waters. Salmon in particular are susceptible to climate and land-use changes; neither of which this petition would resolve. Maintaining the 'Reserve' status of Stewarts Point and Bodega Head preserves a safe habitat for forage and recovery as climate pressures intensify.

State Marine Reserves are the strongest nodes in our system. Downgrading them to SMCAs weakens the ecological connectivity of the entire statewide network.

Agenda item 38: Petition 2023-32MPA: Duxbury Reef - Support as amended

On behalf of Fish On's community, including several local anglers who don't feel comfortable speaking publicly on this issue, we offer our support for the recommendation to expand the existing SMCA and protect the intertidal habitat. There's value to so many communities in protecting the full extent of Duxbury Reef's sensitive and biodiverse habitat, and we believe that additional protection for the more sensitive intertidal zone, while still allowing some recreational fishing, is a practical compromise. We are grateful to the petitioners for the open dialogue and willingness to seek out these middle-ground solutions.

Agenda item 39: Petition 2023-24MPA_AM1: Expand Laguna Beach no-take SMCA - Support with modification

We support this proposed boundary change to enhance protection of the nearshore habitat from commercial activity, but urge you to consider allowing shore-based catch-and-release fishing in the no-take SMCA with a gear restriction of barbless hooks. The law that established the MPA network allows for trying things, experimenting, potentially failing but modifying with adaptive management. A catch-and-release area—where there is strong community support for protection—would be a helpful opportunity to understand the feasibility of enforcing catch-and-release and also the true ecological impact of this type of fishing. This could inform adaptive management going forward, with more potential opportunities for enhanced recreation through catch-and-release protected areas. We see this approach as a compromise, balancing community-led protection and recreational opportunity.

***

Thank you for your extensive time and thoughtful consideration during this management review process.

Respectfully,

Anupa Asokan
Joy Hano
Julia Taylor
Bryan Kirshon
Deborah Filipelli
William Rubin
Clara Zahadek
Jennifer Valentine
Gerald Hallead
Vincent Prudente
Grace Gutierrez
Charles Cohen
Janet Forman
Jenifer Johnson
Rhonda Green
Dawn Albanese
Amy Wolfe
AJ Cho
Sagar Patel
Sherrill Futrell
Patti Packer
Irene Murdock
Serena Ruffilli
Ilana Krug
Sue Nightingale
Dennis Landi
Anna Lukaszewicz
Edith Ogella
Shirley Mills
Natalie Wynn
Bernadette Cuellar

9/29/2026

San Diego County WILDLIFE FEDERATION
www.sdcwf.org

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 95814-4900

Subject: California MPA Review Comments – SUPPORT DFW Recommendations

Dear President Sklar and Commissioners,

As a California angler who fishes the waters off of Point Loma and President of the San Diego County Wildlife Federation, I am writing to ask you to protect our state's recreational fishing culture and economy: please leave the MLPA network as it stands and follow CDFW's staff recommendations to deny the ten non-tribal Bin 2 Marine Protected Area petitions. I also write for the hundreds of anglers we represent in San Diego County who fish the kelp waters off shore and from the shores of the proposed Point Loma extension and the areas off Dana Point.

We support CDFW staff's recommendation. Their review followed the best available science and the state's MPA Master Plan, and they found that these non-tribal Bin 2 petitions bring no new or compelling science to the table and would not actually improve conservation. California's MPA network was built through a long, science-based, public process, and any changes should meet that same high bar. These petitions do not: not on science, not on community input, not on process. Instead, most would simply restrict the public's freedom to fish where the fish are.

Anglers are conservationists, and our only interest is healthy fisheries for today and for generations to come. We represent every part of San Diego County: kids casting their first line and grandparents who have fished these waters for decades, families and first-timers, folks from every background, every race and creed, economic status, hometown, and walk of life. We live in big cities, inland rural communities, and small coastal towns alike.

Recreational angling, including lobster hooping, helps pay for the state's fisheries science, management, and enforcement. Roughly $80 million a year in license fees plus about $20 million more that comes back to California through the federal excise tax on fishing tackle. Recreational fishing adds more than $7.9 billion a year to California's economy, supports over 43,000 jobs, and generates upwards of $672 million in state and local taxes. We see these funds as our direct

contribution to conservation and sustainable fisheries management. Making changes to the MLPA's would also adversely affect the state's R-3 Program by making harder for new anglers to reach good coastal fishing habitat.

Anglers want to be part of the effort to protect ocean health — taking on habitat loss, water quality, stormwater and sewage, plastics, and changing ocean conditions. Fisheries decisions are best made through California's proven, science-based process, so I hope you will keep them there and adopt CDFW's recommendations not to expand the MLPA network. Also ask the CA CCA to expand their STAR Program to provide angler based catch numbers for various species to be used to monitor the fish populations.

Thank you for your consideration of this request, and for your hard work looking after California's coast, waters, sustainable fisheries and the citizens of San Diego County and California.

Respectfully,



Gary F. Brennan
President, San Diego County Wildlife Federation
P.O. Box 3886
Ramona, CA. 92065
(831) 421-2450

Copy to: CCA San Diego Chapter
CCA CA

Outlook

Public Comment on the MPA Petition Process

From Darren Gertler
Date Tue 09/29/2026 04:26 PM
To FGC <FGC@fgc.ca.gov>

Dear California Department of Fish and Wildlife,

My name is Darren Gertler I live and fish in and around Dana Point, and I am a teacher, a father, and a lifelong fisherman. I stand with the entire team at All Waters . org. If I was in person at the meeting I would cede my time to them because a 30 minute public discussion opportunities in sufficient. I am writing to express my support for the science-based denials of the proposed Marine Protected Area (MPA) expansion plans. Please listen to your educated and objective staff who have recommended denying the petitions that are trying to expand MPAS up and down our shared coastline.

I am very concerned that Wade Crowfoot's department at the last second after several years of meetings, public participation, and bin processing jumped in with his own unfounded proposals. Crowfoot did not cite science or fishery facts when he made his proposal. As a member of the public that was engaged sitting through days long zoom meetings I am left disillusioned by his actions.

California’s fisheries—both recreational and commercial—are widely recognized as some of the best managed in the world. This success is rooted in sound science, adaptive management, and a strong culture of stewardship among those who depend on these resources. Expanding MPAs beyond what science supports risks undermining that balance.

I am especially concerned about the long-term impact on future generations. If my 11-year-old daughter is not allowed to fish and meaningfully interact with her local waters, she risks growing up disconnected from the very environment we hope she will protect. She caught and cooked her first lingcod this weekend which will be an event she will remember for the rest of her life. It will guide her to protect and restore her environment. Direct experience with our nearshore ecosystems nurtures not only her ability to provide for herself, but also her sense of responsibility, respect, and advocacy for conservation and access.

Access to these waters helps cultivate the next generation of environmental stewards. Without that connection, we risk losing both the cultural and conservation-minded legacy that has made California a leader in fisheries management.

Thank you for considering my perspective.

Sincerely,
Darren Gertler

Outlook

Public comment — deny MPA petitions that contradict CDFW's science-based recommendations (October 2026)

From Christel Smith
Date Tue 09/29/2026 11:25 AM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

My name is Dr. Christel Smith, PhD (physics). I live in Santa Barbara and boat and fish our Central Coast and Channel Islands waters. I am writing about the MPA petitions before you at the October 13–16, 2026 meeting.

Please deny the MPA petitions that would further restrict fishing access. These petitions are not science-backed, and they contradict the California Department of Fish and Wildlife's own science-based evaluations and recommendations.

CDFW's scientists reviewed the proposals and recommended denial where the petitions would not improve the MPA network, would not advance Decadal Management Review goals, and are not supported by the evidence. The Commission should follow that science — not petitions that ask for more closures without the scientific justification CDFW itself found lacking.

I support healthy oceans and science-based management. I do not support expanding restrictions that CDFW has already determined are not warranted. Please adopt CDFW's recommendations and deny those petitions.

Thank you for considering this comment.

Respectfully,
Dr. Christel Smith, PhD
Physicist
Santa Barbara, CA

Outlook

Public Comment: Support CDFW Recommendations on Bin 2 MPA Petitions

From Jim Bertella
Date Tue 09/29/2026 03:42 PM
To FGC <FGC@fgc.ca.gov>

Dear Members of the California Fish and Game Commission,

My name is **Jim Bertella**. I live in **Costa Mesa, California**, and I have been a proud resident of this state for 53 years. As an avid saltwater angler, I have closely followed the current Marine Protected Area (MPA) expansion process, taking the time to thoroughly read the California Department of Fish and Wildlife's (CDFW) reviews and assessments for each petition.

I am writing to formally request that the Commission **support the California Department of Fish and Wildlife's recommendations on the Bin 2 MPA petitions**. It is vital that we follow the Department's site-specific science, rigorous analysis, and established process before changing any boundaries or adding new restrictions.

Their science-first approach to evaluating each petition has been exceptionally professional, thorough, and outstanding. I fully endorse all of the Department's findings and strongly encourage the California Fish and Game Commission to adopt their science-based recommendations to deny these specific MPA expansions.

Thank you for your dedicated role in this process and for ensuring that the voices of local stakeholders are heard.

Sincerely,
Jim Bertella
Costa Mesa, CA

Outlook

MPA decisions

From martin levy
Date Tue 09/29/2026 09:53 AM
To FGC <FGC@fgc.ca.gov>

Dear Commission members,

As a California angler for over 50 years, I am writing to ask that you protect our state's recreational fishing culture and economy by leaving the MLPA network as it stands and following the California Department of Fish and Wildlife (CDFW) staff recommendations to deny the ten non-tribal Bin 2 Marine Protected Area petitions.

I fully support CDFW staff's recommendation. Their review followed the best available science and the state's MPA Master Plan, finding that these non-tribal Bin 2 petitions bring no new or compelling science to the table and would not improve conservation. California's MPA network was built through a long, science-based, public process, and any changes should meet that same high bar. These petitions fail to do so on science, community input, and process, and would simply restrict public access to fishing.

Anglers are dedicated conservationists representing every part of California, committed to maintaining healthy fisheries for present and future generations. Furthermore, recreational fishing directly supports ocean health and management, generating roughly $80 million annually in license fees, $20 million in federal excise taxes, and contributing over $7.9 billion to California's economy while supporting more than 43,000 jobs.

Fisheries decisions are best made through California's proven, science-based process. I ask that you maintain this standard and adopt CDFW's recommendations not to expand the MLPA network.

Thank you for your consideration and for your work protecting California's coast, waters, and sustainable fisheries.

Sincerely,
martin levy

Martin Levy
[redacted]

Outlook

Public comment — deny MPA petitions that contradict CDFW's science-based recommendations (October 2026)

From Tim Patterson
Date Tue 09/29/2026 06:29 PM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

My name is Tim Patterson. I am a recreational angler / boater from Santa Barbara, CA. I am writing about the MPA petitions before you at the October 13–16, 2026 meeting.

Please deny the MPA petitions that would further restrict fishing access. These petitions are not science-backed, and they contradict the California Department of Fish and Wildlife's own science-based evaluations and recommendations.

CDFW's scientists reviewed the proposals and recommended denial where the petitions would not improve the MPA network, would not advance Decadal Management Review goals, and are not supported by the evidence. The Commission should follow that science — not petitions that ask for more closures without the scientific justification CDFW itself found lacking.

For many working people, access to much of the ocean is already limited by weather, swell, wind, and other ocean conditions. We only get so many safe days on the water. New closures on top of that hit harder — they shrink the days and places where ordinary people can still fish, dive, and gather. These petitions also impact traditional hunting and gathering practices and widen the gap between Californians and the natural resources that have long been part of coastal life.

I support healthy oceans and science-based management. I do not support expanding restrictions that CDFW has already determined are not warranted. Please adopt CDFW's recommendations and deny those petitions.

Thank you for considering this comment.

Respectfully,
Tim Patterson
Santa Barbara, CA
[redacted]

Outlook

Public comment — deny MPA petitions that contradict CDFW's science-based recommendations (October 2026)

From Christel Smith
Date Tue 09/29/2026 11:25 AM
To FGC <FGC@fgc.ca.gov>

Dear Commissioners,

My name is Dr. Christel Smith, PhD (physics). I live in Santa Barbara and boat and fish our Central Coast and Channel Islands waters. I am writing about the MPA petitions before you at the October 13–16, 2026 meeting.

Please deny the MPA petitions that would further restrict fishing access. These petitions are not science-backed, and they contradict the California Department of Fish and Wildlife's own science-based evaluations and recommendations.

CDFW's scientists reviewed the proposals and recommended denial where the petitions would not improve the MPA network, would not advance Decadal Management Review goals, and are not supported by the evidence. The Commission should follow that science — not petitions that ask for more closures without the scientific justification CDFW itself found lacking.

I support healthy oceans and science-based management. I do not support expanding restrictions that CDFW has already determined are not warranted. Please adopt CDFW's recommendations and deny those petitions.

Thank you for considering this comment.

Respectfully,
Dr. Christel Smith, PhD
Physicist
Santa Barbara, CA

Outlook

MPA Expansions

From Kevin Kom
Date Tue 09/29/2026 02:41 PM
To FGC <FGC@fgc.ca.gov>

My name is Kevin Kom, I live in MIssion Viejo and have been a resident of California for 39 years. I am an avid saltwater angler and have closely followed the current MPA Expansion process. I have invested the time to read the California Department of Fish and Wildlife's reviews and assessments regarding each petition. Their science-first approach to each petition was professional, thorough, and outstanding.

I fully support all of the Department's recommendations and encourage the California Fish and Game Commission to endorse their science-based recommendations to deny the MPA expansions.

Thank you for your role in this process and for allowing my voice to be heard.

Sincerely,

Kevin Kom

Mission Viejo, CA

Sent from my iPhone

Outlook

Written Comment for FGC Meeting

From California Surf Fishing
Date Wed 09/30/2026 06:01 AM
To FGC <FGC@fgc.ca.gov>

This is Kaspar Kazazian with www.CalifforniSurfFishing.net

We are submitting the following written comment for the October FGC meetings, applicable to all MPA Petition agenda items:

In 2009, the original MPA Scientific Advisory Team attributed a medium-low Level Of Protection to shore fishing because shore fishing "might" affect populations of fish in deeper waters of the MPA. That was their stated rationale. CDFW continues to reference the 2009 medium-low LOP in their MPA petition evaluations. However, the latest deeper water catch data from the California Collaborative Fisheries Research Program has shown that SMCAs which only allow shore fishing (Swami's SMCA and Stewart's Point SMCA) are performing at least on par (and often better) than fully protected SMRs.

We believe that CCFRP's ongoing credible catch data in shore-only fishing SMCAs disputes the rationale for the medium-low LOP attributed to shore fishing by the 2009 MPA SAT. We recommend that the 2009 medium-low LOP attributed to shore fishing be seriously questioned when evaluating MPA petitions that only allow shore fishing. We believe that SMCAs which only allow shore fishing should have a higher level protection than medium-low and can strengthen the connectivity of California's MPA network.

Even in sandy shoreline beach habitats, catch data from California's Decadal Management Review showed only marginal affects on fish populations outside of MPAs versus inside MPAs.

In addition to California's MPA data, the latest global MPA science attributes a high level of protection to SMCAs that allow shore-only fishing, not medium-low as attributed by the 2009 MPA SAT. Please see our page below for an expanded scientific justification of shore fishing in highly protected SMCAs, including data and references: https://www.change.org/p/allow-shore-fishing-in-smca-s
The page also shows signatures and written comments from 1,400+ shore fishermen in support of SMCA shore fishing.

We hope you consider the latest science when evaluating MPA petitions that allow shore fishing (Mishopshno, Point Dume, etc).

Alternatively, catch and release shore fishing is a very conservative option with scientific consensus; even the conservative 2009 SAT attributed a high level of protection to SMCAs with catch and release shore fishing.

Shore fishing represents one of the most accessible and equitable forms of outdoor recreation, in alignment with several DMR recommendations and MLPA goals. It is also one of the most popular forms of fishing in California, accounting for 34% of fishing trips according to recent CRFS data. Many local businesses are dependent on a thriving shore fishery.

Thank you,
Kaspar Kazazian
www.CaliforniaSurfFishing.net

September 30, 2026

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

RE: Agenda Items No. 26-39 - California MPA Bin 2 Petitions

Dear President Sklar and Honorable Commissioners:

As longtime active participants in the development of California's world-renowned system of coordinated coast and ocean management, we are pleased to support the thoughtful, balanced recommendations made by the Ocean Protection Council (OPC) to strengthen California's marine protected area (MPA) network through the state's adaptive management process.

California's comprehensive approach to coastal and ocean management is the product of ongoing effective coordination. The strength of this system lies not in any single program or agency, but in complementary authorities and management tools that work together to protect coastal and marine resources while providing for public access and responsible use. California's MPA network, the subject of this decadal review, is an important part of this broader framework.

Our collective experience with the state's coastal and ocean management program spans decades, including work to enact the Marine Life Protection Act and establish MPAs, as well as service on the California Coastal Commission, State Coastal Conservancy, and Fish and Game Commission among other statewide roles. These experiences have given us a firsthand appreciation for the value of California's long-term investment in coordinated, inclusive, and science-based management. The state's first comprehensive review of the MPA network after a decade of implementation provides an important opportunity to evaluate its performance, incorporate lessons from monitoring and management, and identify opportunities to improve it.

We urge the Fish and Game Commission to incorporate the OPC's balanced, science-based recommendations. OPC's analysis reflects careful evaluation of individual proposals in the context of the network as a whole, considering network design, ecological and biodiversity benefits, changing ocean conditions, and opportunities to advance Tribal stewardship. The resulting recommendations include targeted adjustments where the evidence supports strengthening the network.

California's integrated approach is especially important now. The State's ability to manage its coast and ocean has long benefitted from coordination among state agencies, local governments, Tribes, federal agencies, scientists, stakeholders, and coastal communities. The federal-state partnership established under the Coastal Zone Management Act is an important component of that framework, including California's authority to review federal activities affecting coastal resources for consistency with the state's federally approved coastal management program. As that program undergoes federal scrutiny, California agencies must work together in a comprehensive approach to coastal and ocean management.

OPC's recommendations reflect that approach. They demonstrate California's ability to evaluate its conservation programs, incorporate more than a decade of monitoring and management experience, respond to changing environmental conditions, and make measured adjustments where the evidence supports them. Please incorporate the Ocean Protection Council's recommendations into the adaptive management process for California's marine protected area network and continue to improve California's broader coastal and ocean management system. Thank you for your careful consideration of our views.

Sincerely,

Dayna Bochco, California Coastal Commissioner*

Donne Brownsey, Former Coastal Commission Chair*

Meg Caldwell, Former Coastal Commission Chair*

Caryl Hart, California Coastal Commissioner*

Bonnie Neely, Former Coastal Commission Chair*

Ann Notthoff, California Coastal Commissioner*

Mel Nutter, Former California Coastal Commission Chair*

Mary Shallenberger, Former California Coastal Commission Chair*

*Organization listed for identification purposes only

September 30, 2026

California Fish and Game Commission
P.O. Box 944209,
Sacramento, CA 94244-2090
Via Electronic Mail: fgc@fgc.ca.gov

RE: Fish & Game Commission October 14-16 Meeting: *Marine protected area Bin 2 petitions*

Dear President Sklar and Commissioners,

The Marine Life Protection Act of 1999 (MLPA) established an ecologically connected network of marine protected areas (MPAs) across California's coastal waters. The law also mandated adaptive management to ensure the network is meeting its objectives, and called for the creation of a process for the Marine Life Protection Program (MLPP) to add, remove, or modify MPAs. Embracing learning through action and experimentation, the MLPA anticipated an MPA network that would evolve through time.

In response to the MLPA's directive for adaptive management, the MLPA 2016 Master Plan established a formal 10-year review cycle to guide adaptive management. It requires each evaluation to look ahead and consider "changing ocean conditions and multiple ocean threats, such as climate change, fishing pressure, water quality degradation … and other existing and emerging issues" (CDFW, 2016). Further, the law and the Master Plan recognize that adaptive management is appropriate even in cases where there is scientific uncertainty.

In the very first application of this policy, the Decadal Management Review (DMR) (CDFW, 2022) identified adaptive management recommendations and priority actions. They include:

- 'improve state agencies' tribal engagement;' (Rec #1)
- 'create a clear pathway to tribal MPA management;' (Rec #2);
- 'build tribal capacity to participate in MPA management activities;' (Rec #3);
- 'apply what is learned from the first Decadal Management Review to support proposed changes to the MPA Network;' (Rec #4)
- 'enhance coastal biodiversity, climate resiliency, human access and use, and a sustainable blue economy;' (Rec #9) and

- ‘work with CFGC and partners to better incorporate marine cultural heritage into the design of the MPA Network.’ (Rec #24)

Many of the petitions endorsed by OPC’s recommendations for this adaptive management cycle closely align with the above priority actions identified in the DMR (CDFW, 2022) and provide a clear pathway for advancing these pressing social and ecological objectives. The prolonged 2014–2016 marine heatwave demonstrated how climate change can undermine the MPA network’s intended performance goals (Huffman et al., 2021). As CO2 emissions rise, the California Current is expected to become a hotspot of rapid change: surface waters are projected to warm by an additional 2–4°C by the end of this century (Sievanen et al. 2018); ocean pH is declining faster than the global trend (Stoll et al., 2025); and low-oxygen events are projected to become more frequent and extreme (Booth et al., 2014). Currently, a super El Nino is likely to heighten and prolong an existing marine heat wave off the coast of California. Experts agree that climate change poses a significant threat to California’s ocean biodiversity and coastal economy (Huffman et al., 2021).

Furthermore, as heavily impacted as the California seascape is now, the human pressures to use the ocean more intensively are only rising (Halpern et al.,2015). California is investing heavily in offshore wind energy production as a key component of its clean energy transition (California Energy Commission, 2022). Demand for the expansion of aquaculture is also rising (Rosamond et al., 2021). As the severity of the freshwater crisis in California intensifies, there will be sustained pressure to develop desalination plants along the coast. Efforts to develop ocean-based carbon dioxide removal (CDR) strategies are intensifying. Because of these trends, scientists warn that we are embarking on an era of large-scale habitat modification in the sea that could trigger a wave of extinctions like those that have occurred on land (McCauley et al., 2015).

The FGC should not wait another decade to strengthen the MPA network. We urge the FGC to take stock of current and future threats to our coastal ecosystems as they make decisions about the petitions. The Commission should adopt the OPC recommended changes, including the climate-resilience strategies proposed in the submitted petitions. Inaction—or making minute adjustments to the network—would neither prepare the MPA network for the changes ahead nor meet the urgency of this moment. Indeed, the 2016 Master Plan states, that “the adaptive management process plays an important role in resource management by providing a framework for responsive change in management measures based on current or emerging stressors.” A limited response would also be inconsistent with the MLPA’s bold vision.

As Secretary Crowfoot and Director Bonham write in the DMR, “Though we face daunting challenges to protect our coast and ocean amidst accelerating climate change,

our Network is a source of hope and inspiration. We look forward to … helping our MPA Network adapt, evolve, and remain a global model of environmental stewardship."

Thank you for your contribution to this important milestone in the evolution of this MPA network.

Sandy Aylesworth, Director, Pacific Initiative, NRDC

Anupa Asokan, Founder and Executive Director, Fish On

Ashley Eagle-Gibbs, Executive Director, Environmental Action Committee of West Marin

Azsha Hudson, Marine Conservation Analyst, Environmental Defense Center

Ray Hiemstra Associate Director, Orange County Coastkeeper

Kerry J. Nickols, Ph.D., Science and Policy Director, Heal the Bay

Tomas Valadez, California Policy Manger, Azul

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Public comment by Dr. Will White, Ph.D.

California Fish and Game Commission

October 13-16, 2026

Commissioners,

I am an Associate Professor at the Coastal Oregon Marine Experiment Station at Oregon State University. I am a marine ecologist who studies coastal ecosystems and fisheries, and one of my primary areas of research is the design and adaptive management of marine protected areas. I created spatial population models that were used by the Science Advisory Team during the MLPA Initiative process, and I was a member of the Science Advisory Team for the North Coast region. Since then my research on the science of monitoring and adaptive management has informed the 2018 CDFW MPA Monitoring and Action Plan and the 2023 Decadal Management Review. I am currently the lead investigator on a project funded by the California Ocean Protection Council to investigate how California's MPA network could be managed to enhance resilience to climate change.

My comment is not specifically advocating for or against any of the petitions being considered. Rather I aim to provide the Commission with some of the latest scientific results regarding MPA management that I hope will inform your decision-making. I have three key points to consider; I elaborate on the scientific rationale for each below.

1. The ecological benefits of MPAs take years to decades to accrue, but those gains can be lost very rapidly when MPA protections are removed.

2. In southern California, there is strong evidence that MPA protections can buffer kelp forests against climate disturbances, particularly marine heatwaves.

3. The latest assessments suggest that the California MPA network is well connected in terms of larval dispersal, but improving those connections would have benefits, especially in light of climate change disturbances.

Regarding point 1, both theoretical models and empirical data show that MPAs can be effective in building up large populations of fish and invertebrates, including older and larger fish that can serve important ecological roles in terms of reproductive output and predation (Lester et al. 2009, Marshall et al. 2019, Hopf et al. 2024). Yet this process can take years or decades, particularly for species in California that are slow-growing and have highly variable larval recruitment from year to year (White et al. 2013, Kaplan et al. 2019, Nickols et al. 2019). By contrast, those benefits of having older, larger fish can be lost rapidly if an MPA is opened to harvest, because fishing can remove old fish much faster than they can grow to old age (Botsford et al. 2019).

Regarding point 2, there is evidence from the 2014-2016 heatwave that older MPAs in the Channel Islands sustained healthy kelp forests, when kelp forests in non-MPA areas and younger MPAs lost kelp. The most likely explanation is that the populations of predators of sea urchins (California sheephead, California spiny lobster) in those MPAs prevented urchins from overgrazing the kelp during that period of heat stress (Eisaguirre et al. 2020). Subsequently, modeling work has shown that protecting species like California sheephead from fishing is expected to be more effective in protecting kelp from heatwave than human restoration actions, like manual urchin removal (Hopf et al. 2025). Because of that ecological mechanism, when considering adjusting an MPA network to be more climate resilient for kelp, the most effective actions are to expand existing MPAs to include more kelp forest habitat, and to establish new MPAs in locations that are not expected to experience intense heat stress. Such locations could include upwelling centers on the central coast, or some locations in southern California that are expected to experience less heat stress(Hamilton et al. 2023). The most detrimental action would be to remove MPA protections in areas that may be affected by climate change (Hopf et al. 2026). These results only apply to southern California, where MPAs protect urchin predators.

Regarding point 3, I coauthored a report submitted to the Ocean Protection Council assessing the level of connectivity in the California MPA network, directly addressing Goal 6 of the Marine Life Protection Act, that the MPAs function as a network (Yeager et al. 2023). Using a combination of population models and ocean circulation models, we calculated that the MPA network did support self-sustaining populations of the fish species we modeled, indicating that the design guidelines were effective in that regard. However that assessment merely indicates that the MPA network meets a minimum threshold for sustaining populations (White et al. 2010, Botsford et al. 2019). Adding additional MPAs to improve connectivity would be expected to have benefits, particularly for species that have

extremely short-range dispersal of their propagules, such as giant kelp (Gaylord et al. 2006). Such connectivity will become increasingly important under climate change, as habitat patches or kelp forests that experience climate disturbance will need to be re-seeded by healthy, surviving habitat patches (Allison et al. 2003, Hopf et al. 2026).

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Outlook

October 13-16, 2026 Commission Meeting – 2023 Marine Protected Area Bin 2 Petitions

From Jim Hendricks
Date Wed 09/30/2026 08:18 AM
To FGC <FGC@fgc.ca.gov>

September 30, 2026

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

Re: October 13-16, 2026 Commission Meeting – 2023 Marine Protected Area Bin 2 Petitions

Dear President Sklar and Members of the Commission:

My name is James Hendricks, and I am a native Californian and an avid private-boat angler. I was introduced to saltwater sportfishing in California at the age of five. I have since introduced my three sons to fishing. They have in turn introduced their daughters and sons to saltwater angling. Together, we—all natives of the Golden State—have created an incalculable number of priceless family memories while fishing off the California coast. We have been able to experience these joys thanks to meaningful public access to California coastal waters.

With that background, I wish express my thanks to the California Department of Fish and Wildlife for its tremendous work and carefully considered recommendations with regard to the 2023 Marine Protected Area Bin 2 petitions.

Further, I want to strongly encourage the California Fish and Game Commission to adopt all of the Department's complete petition-specific recommendations, which were based on the Commission-approved evaluation framework—a process developed in coordination with the Department and the Ocean Protection Council in full transparency and endorsed by stakeholders, as well as the OPC.

With this fully in mind, I wholeheartedly request that the Commission follow the Department's science, the Commission-approved process, and established law. These recommendations retain meaningful public access for anglers and others, while also maintaining the integrity of California MPA network.

Now that the Department has provided its recommendations via the approved process, it seems that some involved with developing, approving and endorsing the evaluation framework do not like how the process turned out, and are now trying to tip the scales in favor of their views. Among these parties is the OPC.

To be clear, some members of the sportfishing community were not completely happy with the results, either. Yet, we and others recognize that we had agreed to the evaluation framework at the beginning of the process. Consequently, you will not find the sportfishing community trying to change the rules after the fact. That would be like adding innings to a baseball game because you don't like the score. We endorse process, and we honor and respect the resulting Department recommendations.

For the Commission to backtrack in this evaluation framework and change the rules at this late juncture would only dishonor and disrespect all of those worked hard in this important Commission-approved process. Stakeholders have all placed their trust in the Commission to ensure that this process would be fair, fully transparent, equitable and honest. Allowing the OPC to now intervene with tactics born of political pressure from above threatens the very credibility and independence of the Commission. It would only reinforce the widely held sentiment among grassroots members of the sportfishing community that their voices ultimately do not matter.

Based on the agreed-upon Commission-approved evaluation framework, the Department's recommendations have emerged in an atmosphere of full transparency and fairness, free of political coercion. The recommendations reflect a compromise grounded in the best available science, established law, and socio-economic equity across various stakeholders and user groups. Please stay the course, honor the process, and adopt the Department's complete recommendations regarding the 2023 Marine Protected Area Bin 2 petitions.

Sincerely,

James Hendricks
Downey, California

AMERICAN SPORTFISHING ASSOCIATION

September 30, 2026

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

Re: October 13-16, 2026, Commission Meeting - 2023 Marine Protected Area Bin 2 Petitions

Dear President Sklar and Members of the Commission:

The American Sportfishing Association respectfully requests that the Commission accept the California Department of Fish and Wildlife's petition specific recommendations for the 2023 Marine Protected Area Bin 2 petitions, including its recommended denials. ASA remains committed to partnering with California to address biodiversity loss while sustaining healthy fisheries and meaningful recreational fishing access.

California established lasting conservation commitments through the Marine Life Management Act and Marine Life Protection Act, completing its redesigned statewide MPA network in December 2012. These efforts established complementary approaches to conserving marine ecosystems through sustainable fisheries management and spatial protection.

California also invested in scientific monitoring and adaptive management to evaluate the network's performance and guide adjustments. The Decadal Management Review assessed progress toward conservation objectives, and CDFW subsequently evaluated the petitions using the Commission's approved framework, developed with assistance from Commission and Ocean Protection Council staff.

OPC's separate petition review used different questions and criteria, leaning on predictive presumptions, and emphasizing a precautionary approach to strengthening the network. **ASA believes the Commission should accept CDFW's professional recommendations and that departing from those recommendations will compromise public trust in the scientific review and public participation process California established dating back to 2012.**

CDFW also acknowledges that its socioeconomic assessments remain preliminary and that important information about community impacts is missing. Before additional fishing restrictions are adopted, ASA urges meaningful engagement with local, lower income and marginalized communities to understand potential effects on food security, cultural practices, fishing and travel costs, and access for shore based and small boat anglers. That assessment should include families who harvest seafood and communities with limited alternatives.

Completion of this petition process should strengthen, not conclude, California's biodiversity work. CNRA's Pathways to 30x30 emphasizes partnerships, restoration, coordination among governments, and evaluation of conservation outcomes. ASA is prepared to work with CDFW, the Commission, OPC, California Tribes, federal agencies, researchers, conservation organizations and coastal communities to identify priority threats, match actions to their causes and measure results.

In line with OPC's "durability" priority for 30x30 MPAs, we suggest that the next phase should establish shared priorities and measurable objectives for habitat restoration, water quality improvements, pollution reduction, fisheries management and continued MPA monitoring. ASA and the broader recreational angling community are ready to help connect recreational anglers and fishing businesses with research, monitoring and stewardship opportunities that contribute to those objectives.

We also remain committed to collaborative approaches that strengthen Tribal cultural fishing, stewardship and participation in marine management without presuming that additional recreational fishing closures are necessary.

ASA respectfully asks the Commission to accept CDFW's recommendations and build on the partnerships developed through this process. We look forward to working together to conserve biodiversity, strengthen Tribal stewardship, support food security and coastal communities, and sustain healthy, accessible fisheries.

Respectfully,

Larry Phillips
Pacific Fisheries Policy Director
American Sportfishing Association

California Fish and Game Commission

P.O. Box 944209

Sacramento, CA 94244-2090

September 30, 2026

Re: MPA Decadal Review final decision

President Sklar, Commissioners, Staff and CDFW,

This has certainly been a long journey we have all traveled. For some, it started with a late- night phone call from former Director Bonham with promises. We have been through many, many meetings and phone calls. Representing the recreational angling community, we have had our differences along the way but have chosen to heed the advice to take the high road during this process. The rules of engagement and process were laid out, discussed, and accepted by the Commission. Some policies or procedures evolved along the way, but we always focused on the original goals of the decadal review. We have strived to keep the 30x30 process separate.

Here we are at the decision-making time, and we have all reviewed the CDFW recommendations along with vast user input. We still maintain the decisions that need to be made from the guidelines and rules that were approved for this process. There needs to be sound, scientific rationale used to objectively and fairly decide each petition. Please do not accept actions that lack adequate support for new restrictions or boundary changes and narrower measures, research, permitting and enforcement, and co-management options that need more work.

With that, we (the recreational angling community) strongly recommend you accept the CDFW recommendations. They have tried their best to adhere to these guidelines and rules. We hope we are not disappointed in your decisions that could erode our trust in abiding by the rules and process as appropriate.

We look forward to celebrating the closure of this long process and on to more important fisheries and ecosystem management efforts that truly impact our state waters.

Regards,

Wayne Kotow

Executive Director CCA California – Retired

Outlook

MPA petition 2023-24 Laguna Beach SMCA

From Brian Woolley
Date Wed 09/30/2026 07:15 AM
To FGC <FGC@fgc.ca.gov>

President Sklar and Commissioners,

My name is Brian Woolley, and I am a 30-year Commercial Passenger Fishing Vessel (CPFV) captain at Dana Wharf Sportfishing. I have been fishing and working in the area of the proposed petition for that same period of time.
I ask you to support CDFW's recommendations on the non-tribal Bin 2 MPA petitions. Having spent three decades on the water here, I have personally observed the health of our local fisheries and the dedication of our angling community. Furthermore, we rely on particular areas in the Laguna Beach Marine Protected Area under petition number 2023-24MPA to take hundreds of disabled kids fishing, local kids groups and clubs, and first-time anglers.

Based on the Department's site-specific review, I do not believe the proposed change has shown a clear conservation benefit that justifies additional restrictions.

Please follow the Department's science and process, retain meaningful public access, and use targeted tools for management such as enforcement, education, bag limits, size limits, temporary closures, or habitat restoration where appropriate.

The Commission has the opportunity to show that California's MPA Network can protect marine ecosystems while remaining respectful of sustainable recreational access. The most durable path is to follow the framework already adopted and adopt CDFW's complete recommendations for the 2023-24 Bin 2 petitions.

Thank you,

Brian Woolley
Dana Wharf Sportfishing

California Fish and Game Commission September 30, 2026

RE: Marine Protected Areas Petitions

Sent electronically to: fgc@fgc.ca.gov

Dear President Sklar and Commissioners,

Please accept these comments from the San Diego Fishermen's Working Group (SDFWG) and the Alliance of Communities for Sustainable Fisheries (ACSF):

Who We Are

The SDFWG is a 501-c-3 non-profit dedicated to advocating for the interests of San Diego area commercial fishing men and women. It's Board of Directors is comprised of representatives of all the major fisheries in the region.

The ACSF is also a 501-c-3 organization representing the interests of commercial fishing in the Central Coast. Its Board of Directors is made up of representatives from the seven fishing communities in the region from Half Moon Bay south to and including Santa Barbara.

Summary Position Statement

Based on evidence, the SDFWG and the ACSF do not believe creating new or more restrictive MPAs are scientifically warranted and are not in best interest of Californians. Please accept the recommendations of the DFW to deny all petitions. Further, Tribal petitions are best addressed by allowing tribes to petition for name changes of existing MPAs, and possibly allow for subsistence and cultural tribal uses within certain existing MPAs. Or, alternately, address tribal requests through an Alternative Pathway via State Marine Cultural Preservation Areas,

Introduction

To truly understand the effectiveness of the MLPA we need to go back to the early science used to support the MLPA. “The Science of Marine Reserves” was the product of a network of funding from the Packard Foundation. The opening paragraph of that report states:

> *“Fish, shellfish and other species are declining in many places. The changes are impairing the ocean’s capacity to provide food, protect livelihoods, maintain water quality, and recover from environmental stress.”*

During implementation of the MLPA, the authors of the report turned out to be the lead scientists in the design of the criteria for establishing the MPAs, and several served on the science advisory panels that evaluated proposals that led to the existing MPA network. In many ways the MLPA-MPA network is the “crown jewel”—the high point-- of the MPA movement in the United States. The scientists who were central to the MPA movement designed the MLPA network to meet what they felt were criteria for success.

Initially, the MPA movement was about decline in the abundance of marine species, and the impact of this decline on food and livelihoods. The DFW Decadal Review demonstrates how the biological objectives of MPAs have been largely lost, and success is now measured not by better ecological outcomes, but by public outreach, monitoring and enforcement. The 10-year review devotes 23 pages to monitoring and research, 16 pages to outreach and education, and 15 pages to enforcement, but only 11 pages to performance. Within these pages only 4 discuss the abundance and trends in marine biota. There is no mention of food or livelihoods in the entire review—which is a long way from early MPA rationales.

Most MPA advocates say they want to “protect” the marine ecosystem, but in practice the only “threat” MPAs protect the ocean from is fishing. They do not protect from global warming, ocean acidification. sea level rise, coastal development, runoff of sediments and pollutants from the land, invasive species or shipping. If there is a problem with overfishing the best way to solve the problem is to reduce fishing effort. MPAs don’t reduce fishing effort, they simply move it

The first MLPAI process, following the MLPA law, had structured science and stakeholder panels. This is substantially different from the FGC’s petition process.

Process Concerns

The SDFWG and ACSF has deep concerns over the process the FGC is utilizing to evaluate MPA petitions which could possibly result in new restrictions on the state’s struggling fishing industry. Many of the arguments that MPA proponents use amount to “more is always better”. Quite often these proponents throw out science claims to bolster their view.

As we see it, the role that the CDFW’s science team plays in evaluating the petitions is now unclear, as is the Commission’s role in evaluating the science behind the petitions.

Has the Commission decided to judge MPA petitions based on how many supporters turn out? If the Commission is going to rely on the best science, and the best matching of MPA petitions with the Marine Life Protection Act goals, the results of the first Initiative, and the results of the Decadal Review, why do the recommendations of the CDFW's science/policy team appear to carry little weight? A case in point are claims that new MPA petitions somehow correct errors in the size and spacing guidelines developed during the MLPAI process, when in-fact careful consideration was given to that very issue by the Science Advisory Team.

We also contrast the current petition process with the process used in the MLPAI. In that process, there were defined stakeholder representatives, and a defined science team which did its best to utilize the best available science in meeting the goals of the MLPA. A dedicated "Blue Ribbon Task Force" weighed differing needs and perspectives and made recommendations to the FGC. Although the MLPA contains no requirement to utilize socioeconomic information in evaluating MPA arrays, such information was developed. The current MPA petition process has no process for the Commission to learn of socioeconomic consequences of adding more fishing (and other human uses) restrictions. Before adopting any new fishing closures, the Commission should require a complete socioeconomic and community impact review, including displacement of small-vessel fishermen, increased operating costs, safety concerns, impacts to dockside markets and shoreside businesses, and reduced public access to locally harvested seafood. Such information will be needed to fulfill the intent of the FGC's recently adopted "Coastal Fishing Communities Project".

Decadal Review Claims and MPA Science

The results of the Decadal Review are often misrepresented. The OPC letter (as do several petitioners) claim that the Decadal Review showed the state's MPA network "improving ocean health".

What the decadal review actually states is:

> *"Although biodiversity of select marine species was higher inside MPAs in some habitats and bioregions (Appendix B.2-B.4), statewide and regional trends across habitats showed no difference in biodiversity inside compared to outside MPAs."*

The Decadal Review also concluded:

> *"Some ecological communities demonstrated greater resiliency inside MPAs compared to those outside of MPAs and recovered more quickly after the heatwave, though analysis across habitats in the central coast revealed that MPAs did not provide strong resilience against the marine heatwave."*

This CDFW science review also counters petitions that assert more MPAs are needed to protect kelp from marine heatwaves.

(Related supporting global analysis shows the diversity of species inside MPAs was higher than outside (Lester et al., 2009); however, this was not found in the California's MLPA network.)

Additional Science Brings the Effectiveness of CA MPA's in Question

Studies of California MPAs are revealing they are less effective than speculated. The following studies demonstrate MPAs are not increasing net biomass, not increasing biodiversity, and not increasing resilience to heat waves, in state waters:

On the question of abundance relative to MLPA MPAs, one independent study that evaluated the regional change in abundance, used non-targeted species as the control. This study, using data for the Channel Islands, the first MPAs established in the southern region, could not detect a statistically significant regional increase in targeted species. Ovando et al. (2021) did find that the abundance inside MPAs in the Channel Islands was 81% higher, but that there was no significant *regional* impact.

The results from the MLPA seem to reflect a general level of uncertainty about the benefits of MPAs to climate resilience (Bates et al., 2019; Bruno et al., 2019; White et al., 2025).

Furthermore, we note that if removing fishing pressure increases climate resilience, then the displaced effort outside closed areas would decrease it.

It's important to recognize that actual data on the oft asserted claim that MPA-induced trophic cascades (more urchin predators, fewer nasty sea urchins, and more kelp) is not supported by long-term data. MPAs did not detect that cascade. Purple urchins and giant kelp were unaffected, whereas the directly harvested red urchin increased (Malakhoff and Miller2021- https://doi.org/10.1098/rspb.2020.3061).

Numerous other papers found in the scientific literature, including (Smith et al) 2023) examined climate resilience from the MLPA and concluded:

> *"Collectively, our findings suggest that MPAs have limited ability to mitigate the impacts of marine heatwaves on community structure."*

Another paper, (Freedman et al., 2020), looked at a range of species in kelp ecosystems and concluded "the MPAs had not provided any resilience to the community."

Much of the science that make claims of increased abundance inside MPA's, compared to "control" areas neighboring these MPA's. Since MPA's displace fishing effort outside of the MPA, there is little to no net increase in abundance. Further, as a control area, since fishermen are displaced to that area, it can never be a real control area.

Additionally, almost all of the published papers on MPAs equate evidence of spillover to areas outside MPAs to net increases in total abundance and catch (da Silva et al., 2015; Harmelin-Vivien et al., 2008; Di Lorenzo et al., 2020; Medoff et al., 2022). This assumption is *not supported* by either theory or empirical evidence. Because fish and/or larvae move, there will always be gradients in abundance near the edge of an MPA. However, it does not mean there are regional increases in abundance if the area outside has higher fishing pressure (Hilborn et al., 2025), nor that there is more catch simply because fish move from inside to outside. Net movement of eggs, larvae, or large fish from inside to outside is a necessary condition for regional abundance increases and benefits to catch, but numerous models (Botsford et al., 2003; Hilborn et al., 2006; White et al., 2011; White et al., 2013; Ovando et al., 2021) have found that to increase catch, overfishing must be taking place and the size of the MPAs must be matched to the movement of the fish.

Of course, overfishing is not occurring in California waters.

There is convincing evidence that fish inside MPA's are larger, and more fecund. However, fishery management regulations already set size limits on most species to address sustainability of populations. And, if larger fish are to be protected, regulations could more effectively increase species size statewide, and not just in MPA's.

From "A Synthesis of Ecological and Social outcomes from the California Marine Protected Area Network" (Caselle, Smith, Nickols, Lopazanski, 2023):

> *"We found no clear effect of these MPAs on mean total biomass densities at the population level… We found no clear effect of these MPAs on mean total biomass densities at the population level" (It is important to recognize that this study clearly concludes that there are major data-gaps and that further monitoring is needed, including expanding the scope of monitoring.)*

This paper does not conclude that more MPAs are needed.

"A marine protected area network does not confer community structure resilience to a marine heatwave across coastal ecosystems" April 2023; Carr, Starr, Caselle, Smith, Free, Lopazanski, Brun, Anderson, Claudet, Dugan, Eurich, Francis, Hamilton, Mouillot, Raimondi, Ziegler, Nickols.

“Assessing the Population-level Conservation Effects of Marine Protected Areas” (March 2023 Ovando, Caselle, Costello, Deschenes, Gaines, Hilborn, Liu), makes a similar finding..

“We found no clear effect of these MPAs on mean total biomass densities at the population level” (2021. DOI: 10.1111/cobi.13782).

“There was no difference in fish diversity between MPA and reference sites within any of the habitats” (2023. DOI: 10.25494/P6430V).

A Remarkable Discussion Points to the Need for More Data, not More MPAs

Drs Ray Hilborn and Mark Carr filmed their discussion on California’s MPA network. They conclude that a lack of data on performance prevents declarations that MPAs are working, or can be adaptively managed, in light of the lack of study of outside control areas. No new MPAs should be created until there is better data. See https://www.youtube.com/watch?v=4nnNZ2gcZQs&t=96s

Competing scientific claims on MPA performance, or lack of, also show the need for more/better data and analysis.

Socioeconomic Analysis

Will socioeconomic data be developed to inform FGC MPA petition decision-making? If the FGC is serious about support for its Fishing Community Sustainability Plan it will require a thorough socioeconomic review of each of the MPA petitions, should they be enacted. How else will the Commission know the effects of one or more of the petitions restricting/curtailing commercial fishing on the industry as a whole and at the community level?

If asked, the great majority of California fishermen will say that fishing opportunity—including areas where the fish are likely to be caught—can’t continue to be reduced if there are to be commercial fisheries. A certain volume of product needs to be landed in a port to sustain the infrastructure, markets, the ability to earn a living, and fishing community structure.

Tribal Petitions

The ACSF and the SDFWG support changing the names of certain existing MPAs to reflect the tribal heritage in the region. We support and respect the recognition of the heritage and cultural contributions of the tribes to the state.

Tribal petitioners argue that cultural values were not represented in the MLPAI process, and that a scientific evaluation is not enough. However, goal 4 of the MLPA stipulates:

"Protect marine natural heritage, including protection of representative and unique marine life habitats in California waters for their intrinsic values".

It can be argued that everyone's cultural and spiritual values are contained in the concept of *intrinsic values.*

Some tribal petitioners also argue that cultural/spiritual values are more important than and supplant, science. Of course, everyone is entitled to hold cultural and spiritual values. With so many personal values, the scientific method must sort through evidence to determine recommendations for resource management.

It must be noted that California hosts multigenerational fishing families and their community culture also exists. There is ample evidence of the importance of fisheries to California coastal communities. This is evidenced by the FGC's own Fishing Community Plan.

It also must be noted that Tribal members have always been able to obtain recreational and commercial fishing licenses and permits, and use ocean resources, for subsistence, or for livelihoods. And, to serve disadvantaged communities, the state's public piers are free—no license required.

Exclusive tribal MPAs will exclude many other users, benefiting just one group. With the exception of the pathway of State Lands Commission and federal leases (oil and gas, offshore wind, etc), no single group of individuals should be granted exclusive rights to the state's offshore resources.

In Conclusion

Based on evidence, the SDFWG and the ACSF do not believe creating new or more restrictive MPAs are scientifically warranted and are not in best interest of Californians. Please accept the recommendations of the DFW to deny all petitions. Further, tribal petitions are best addressed by allowing tribes to petition for name changes of existing MPAs, and possibly allow for subsistence and cultural tribal uses within certain existing MPAs. Or, alternately, address tribal requests through an Alternative Pathway via State Marine Cultural Preservation Areas,

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

September 30, 2026

RE: General Written Comment Regarding 2023 Marine Protected Area Petitions

Dear President Sklar and Commissioners:

The Ventura County Commercial Fishermen's Association (VCCFA) represents California commercial fishermen and fishing-industry stakeholders associated with Ventura County's three commercial fishing ports and landing harbors: Port Hueneme, Channel Islands Harbor, and Ventura Harbor. VCCFA currently has 85 members and works to support the continued viability of commercial fishing, working waterfronts, local seafood production, and the fishing communities that depend upon them.

VCCFA recognizes the substantial undertaking involved in conducting the first major review and potential modification of California's Marine Protected Area (MPA) Network following the Decadal Management Review. We particularly appreciate the regional meetings and workshop-style opportunities that were presented throughout this process.

It is precisely because these decisions are consequential that VCCFA believes deficiencies identified during this process should be addressed before final regulatory decisions are made.

VCCFA's Interest in the Statewide MPA Petitions

VCCFA's interest in this process extends beyond MPA petitions located immediately adjacent to Ventura County. Our members are California commercial fishermen who operate within a statewide system of fisheries and fishing grounds. Changes in fishing access in one part of California can have consequences for fishermen and fishing grounds elsewhere.

When productive fishing territory is removed from access, the fishing effort that previously occurred there does not necessarily disappear. Some portion of that effort may relocate to other open fishing grounds, including grounds already utilized by fishermen operating from Ventura County ports. For this reason, an MPA modification occurring elsewhere in California can have consequences extending beyond the immediate geographic area of the proposed closure.

VCCFA therefore has an interest in the evaluation of all 15 petitions, particularly those that would expand MPAs or otherwise reduce fishing access. Our participation is based not only upon the direct effects of petitions within or near our region, but also upon the potential statewide consequences of displaced fishing effort, reduced fishing territory, cumulative restrictions upon access, and the resulting effects upon California's commercial fishing communities and working waterfronts.

A Threshold Concern Before Final Decisions Are Made

VCCFA believes it is important to clearly identify, before final decisions are made, what we consider to be a significant deficiency in the information available for evaluating certain petitions that would expand MPAs and reduce fishing access.

Our concern is not that socioeconomic information is entirely absent from the record. Petitioners, the California Department of Fish and Wildlife (CDFW), the Ocean Protection Council (OPC), stakeholders, fishermen, and members of the public have provided varying amounts of socioeconomic, fisheries, and landings information.

The more fundamental question is whether the record for a particular petition provides a sufficiently complete analysis of the reasonably foreseeable consequences of removing fishing access.

Identifying that fishermen may lose access to a productive fishing ground answers only the first part of that question.

For purposes of evaluating an MPA expansion, VCCFA believes meaningful socioeconomic and spatial-displacement analysis should examine, to the extent reasonably ascertainable:

- commercial fishing activity occurring within the proposed closure;
- fishing effort and landings associated with that area;
- the amount of fishing effort reasonably expected to be displaced;
- where that displaced effort is reasonably expected to relocate;
- fishing effort and landings already occurring within likely receiving areas;
- the additional fishing pressure those receiving areas may experience; and
- the potential ecological, economic, productivity, and sustainability consequences of concentrating additional fishing effort within the remaining open grounds.

The absence of adequate analysis of these questions does not mean those consequences do not exist. It means those consequences have not yet been adequately evaluated.

VCCFA therefore strongly urges the Commission not to approve a petition expanding an MPA or otherwise reducing fishing access where the complete record does not provide sufficiently meaningful socioeconomic and spatial-displacement analysis. Such petitions should be denied or deferred until the reasonably foreseeable consequences have been adequately evaluated and incorporated into the record.

California's Own Adaptive-Management Framework Recognizes These Concerns

VCCFA's concern regarding displacement of fishing effort is not a new concept being introduced at the end of this process.

California's MPA management framework has long recognized the importance of ecological and socioeconomic information, human-use patterns, and fishing activity. The Decadal Management Review incorporated both ecological and socioeconomic information and identified continuing knowledge gaps relevant to adaptive management.

Importantly, California's regional MPA planning history also recognized the consequences of shifting fishing effort. Regional design considerations included the objective of preventing fishing-effort shifts that could result in serial depletion. Similar consideration of fishing-effort shifts appears across California's regional MPA planning history.

The current 2023 MPA petitions arose from the adaptive-management process following the first Decadal Management Review. VCCFA therefore believes it is appropriate to evaluate proposed MPA modifications using the broader perspective contemplated by that adaptive-management framework: not simply what may happen within a newly protected area, but what reasonably foreseeable consequences may occur outside its boundaries.

The Petition Process Did Not Require a Complete Displacement Analysis

The application process itself helps explain why important information may now be missing.

The 2023 MPA petitioners used the Commission's FGC-1 Petition for Regulation Change. The required portion of that form did not expressly require the detailed socioeconomic and spatial-displacement analysis described above. Economic or fiscal impacts appeared within the form's optional-information section.

Additional MPA-specific considerations were made available to prospective petitioners, but petitioners were encouraged rather than required to address that supplemental information.

Consequently, the petition process did not expressly require an applicant seeking to remove fishing access to answer fundamental questions such as: How much fishing activity currently occurs within the proposed closure? How much is reasonably expected to be displaced? Where is that effort likely to go? How much fishing activity already occurs there? What additional pressure could those receiving grounds experience? What are the reasonably foreseeable economic and ecological consequences?

CDFW subsequently conducted substantially more detailed technical evaluations of the petitions, and OPC separately provided analysis and recommendations. VCCFA recognizes the additional information those efforts have contributed to the record.

However, the existence of socioeconomic information does not by itself establish that the complete spatial-displacement question has been answered.

The Commission, as the ultimate regulatory decision-maker, should determine whether the complete record for each petition provides sufficient information to answer those questions before approving additional restrictions.

The Evidentiary Burden Should Begin With the Petitioner

VCCFA does not believe the principal burden of filling these information gaps should fall upon affected fishermen, fishing organizations, CDFW, OPC, Commission staff, or taxpayers after a petition has already advanced toward regulatory action.

The party requesting a regulatory change that would remove fishing access should bear the principal burden of providing sufficient information to evaluate the reasonably foreseeable consequences of that change.

CDFW and OPC have important analytical and advisory roles, and the Commission remains responsible for evaluating the complete record and making the ultimate regulatory determination. But a petitioner requesting additional restrictions should provide sufficient information for the Commission and affected public to understand the likely consequences of the proposal.

If the petition requirements did not require information necessary for that evaluation, the resulting information gap should not be interpreted as evidence that the consequences are insignificant or nonexistent. It is a limitation of the information-development process that should be corrected before final regulatory action is taken.

Once a significant deficiency in the information necessary to evaluate a proposed regulatory change has been identified, completing the process should not take precedence over correcting that deficiency.

Where material information remains incomplete, the appropriate response is to obtain the missing information. The time reasonably necessary to develop an adequate record should take precedence over completing the present adaptive-management cycle according to a predetermined timetable.

Displacement Can Affect Remaining Open Fishing Grounds

MPA boundaries do not operate in isolation.

When fishing access is removed from productive fishing grounds, the fishing activity that previously occurred there does not necessarily disappear. Some portion of that effort may instead be displaced into other open fishing grounds, including areas already supporting existing commercial and recreational fishing activity. This redistribution can occur wherever affected fishermen are reasonably able to continue operating, and its consequences therefore may extend well beyond the boundaries of the proposed closure.

The ecological footprint of an MPA decision therefore cannot always be measured solely by the boundaries drawn on the map.

The point is not to predict with certainty where every fisherman will go. That is precisely why meaningful displacement analysis is necessary.

The central questions are:

Where will the displaced fishing effort go, how much additional pressure will receiving areas experience, and what are the ecological, economic, and operational consequences of that redistribution?

If productive fishing grounds are removed from access while fishing activity continues, some portion of that effort may become concentrated within a smaller amount of available fishing territory. The Commission should have sufficient information to evaluate how fishing activity and landings may shift, the additional pressure likely receiving grounds may experience, and the potential consequences for the productivity and sustainability of those remaining open areas.

Regulatory Displacement Can Create Secondary Management Consequences

The consequences of displacement may extend beyond the immediate effects upon fishermen.

Concentrating fishing effort into remaining areas may increase pressure upon those areas. If conditions subsequently change, future managers examining those fishing grounds should have a record that allows them to understand the regulatory decisions that may have contributed to changes in the geographic distribution of fishing activity.

Without that information, there is a risk of a regulatory cycle in which fishing grounds are closed, fishing effort shifts into remaining grounds, pressure becomes more concentrated within those grounds, and resulting conditions may later contribute to calls for additional restrictions.

VCCFA believes that possibility should be considered before approving additional closures—not years afterward.

Documenting reasonably foreseeable displacement before a regulatory decision is therefore important not only to today's fishermen, but also to future adaptive management. Managers examining conditions 10 or 20 years from now should be able to understand not only what areas were closed, but where displaced fishing activity was reasonably expected to go.

Economic Consequences Extend Throughout Working Waterfronts

The same distinction applies to economic impacts.

Identifying that a proposed closure may affect commercial fishermen does not, by itself, provide a meaningful assessment of the economic consequences to fishing communities.

Commercial fishing operates as an interconnected economic system. Vessel landings support vessel owners and crews, fish receivers and processors, dock and harbor operations, fuel and marine-service businesses, ice and gear suppliers, vessel maintenance and repair, transportation, seafood markets, restaurants, and employees whose livelihoods depend in varying degrees upon continued fishing activity.

A substantial reduction or redistribution of landings can therefore produce consequences extending beyond the vessels directly affected by a proposed closure.

California fisheries-management guidance recognizes the importance of considering direct effects upon fishermen together with broader effects upon employment, businesses, and fishing communities.

This is particularly important to working waterfronts such as Ventura Harbor. According to the Ventura Port District, between 2009 and 2023 Ventura Harbor averaged approximately 23 percent of California market-squid offloading, and nearly $200 million in market squid was offloaded at Ventura Harbor during that period.

That production does not exist in an economic vacuum.

Meaningful economic analysis of a proposed closure affecting commercially productive fishing grounds should examine, where reasonably ascertainable, the production associated with those grounds; the vessels, fisheries, and ports dependent upon that production; potential changes or redistribution in landings and ex-vessel value; effects upon vessel owners and crews; effects upon receivers, processors, and employment; and reasonably foreseeable downstream effects upon supporting businesses and working-waterfront communities.

It should also consider an important question connecting economic consequences directly to spatial displacement:

Can displaced fishing activity reasonably maintain comparable production from the remaining accessible fishing grounds, and what are the economic and ecological consequences if it cannot?

Commercial fishermen produce food. Decisions reducing access to productive fishing grounds therefore implicate more than fishing opportunity. They can affect domestic seafood production, working-waterfront economies, and the availability of locally landed wild-caught seafood.

Cumulative Spatial Pressures Should Also Be Considered

Commercial fishermen operate within an ocean increasingly subject to competing spatial demands and restrictions, including aquaculture development, energy infrastructure and development, MPAs, and other ocean uses and management measures.

Each individual action may occupy only one portion of the ocean. The cumulative consequence to fishermen, however, can be substantially greater than the effect of any single action considered independently.

For that reason, evaluating an individual MPA expansion solely by the percentage of California waters remaining technically open to fishing can provide an incomplete picture. Not every acre of open ocean represents equivalent fishing opportunity, productivity, accessibility, habitat, seasonality, or economic value.

The more meaningful question is what productive fishing capacity may be affected and whether remaining accessible fishing grounds can reasonably accommodate displaced activity while continuing to support the fishermen, fisheries, and working waterfronts dependent upon that production.

Tribal Engagement, Process Design, and MPA Boundary Decisions

VCCFA recognizes the importance of meaningful engagement with California Native American Tribes and Tribal communities. Tribal knowledge, history, stewardship, and contemporary use are legitimate components of ocean management, and VCCFA supports constructive collaboration and appropriate co-management or cooperative-management frameworks.

Our concern is not Tribal participation itself, but rather ensuring that proposed MPA modifications—regardless of the identity of the petitioner—are evaluated using consistent, transparent, and sufficiently rigorous ecological, socioeconomic, and spatial-displacement standards.

The Decadal Management Review recognizes the importance of increased Tribal engagement, Indigenous knowledge, and meaningful opportunities for collaboration. VCCFA supports those objectives.

Regardless of who submits a petition, VCCFA believes the reasonably foreseeable consequences of the proposed regulatory change should be evaluated using a sufficiently complete record.

Learning From the First Major MPA Modification Process

This process provides California with an opportunity not only to decide the petitions presently before the Commission, but also to improve MPA adaptive-management processes going forward.

VCCFA believes **current and future MPA modification procedures should expressly require meaningful evaluation of:**

- existing commercial and recreational fishing activity within proposed closure areas;
- reasonably foreseeable displacement of that activity;
- likely receiving fishing grounds and existing activity within those areas;
- ecological and productivity consequences of concentrating additional effort;
- socioeconomic impacts upon fishermen, ports, processors, working waterfronts, and fishing communities;
- direct and downstream economic effects, including employment and supporting businesses;
- effects upon domestic and local seafood production;
- cumulative impacts from other spatial restrictions and competing ocean uses;
- relevant historical information concerning existing MPA design; and
- ecological effects occurring both inside proposed protected areas and in areas receiving displaced fishing effort.

California has invested considerable resources in building and monitoring its MPA Network. Decisions modifying that Network should therefore be based upon a record sufficiently complete to evaluate both the anticipated benefits and the reasonably foreseeable consequences of those modifications.

VCCFA respectfully asks the Commission to examine the complete record for each petition and not approve an expansion or additional restriction where meaningful socioeconomic, economic, and spatial-displacement analysis remains materially incomplete.

Where significant information gaps remain, the appropriate response is to obtain the missing information before acting.

The absence of adequate analysis does not mean those consequences do not exist. It means those consequences have not yet been adequately evaluated.

Respectfully submitted,



Dave Colker
Executive Director
Ventura County Commercial Fishermen's Association (VCCFA)

Outlook

Oppose the proposed MPA changes

From Douglas Imperato
Date Wed 09/30/2026 11:08 AM
To FGC <FGC@fgc.ca.gov>

I strongly oppose the proposed changes to Marine Protected Areas, particularly those that would further restrict fishing access in the Santa Barbara Channel and surrounding shorelines. These areas already contain extensive areas where fishing is prohibited or significantly restricted, and local fishermen have adapted their practices to comply with those protections. Additional closures would further reduce access to productive fishing grounds without necessarily providing a corresponding conservation benefit. The Santa Barbara Channel supports a long-standing recreational and commercial fishing community, and these waters are an important part of our local economy, culture, and way of life. Before imposing additional restrictions, the state should demonstrate with clear, site-specific scientific evidence that existing protections are insufficient and that the proposed changes will produce measurable conservation benefits. Fishermen who have spent decades on these waters also possess valuable knowledge about local fish populations, habitat, and changing conditions, and that knowledge should be meaningfully incorporated into the decision-making process. I believe conservation and responsible fishing can coexist, and the state should focus on science-based management rather than expanding protected areas simply because additional restrictions are possible.

Douglas Imperato, Ph.D.
Santa Barbara

Sportfishing Association of California
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September 30, 2026

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

Submitted electronically to fgc@fgc.ca.gov

Re: 10/13/2026-10/16/2026 CA F&G Commission Meeting: MPA Petitions

Dear Commissioners:

The Sportfishing Association of California (SAC) appreciates the opportunity to offer the following comments on Agenda Item 7: Bin 2 Marine Protected Area (MPA) Petitions: Evaluations and Recommendations for MPA Regulation Change Petitions. SAC is an organization whose membership includes commercial passenger fishing vessels (CPFV) and the landings from which they operate throughout the coastal ports of California. We provide public access to over one million visitors annually for fishing, whale watching, marine tourism, and ocean charters. For many Californians, our members provide affordable and convenient means to access and experience the plentiful marine resources off our coast.

SAC appreciates the work of the California Department of Fish and Wildlife (CDFW) and the Ocean Protection Council (OPC) in developing their respective recommendations on the Bin 2 Petitions. **SAC recommends the Fish and Game Commission (FGC) deny all MPA Petitions that both CDFW and OPC recommend denying.[1] Additionally, we suggest the FGC adopt the science-based recommendations provided by CDFW where their recommendation differs from OPC's policy-based recommendation**s. In this letter, we provide generalized comments on the MPA petition process. Separately, we will be submitting petition specific comments on individual petitions.

[1] 2023-19MPA_AM1, 2023-20MPA_2_AM, 2023-14-MPA (all 9 actions), 2023-15MPA-AM (all 3 actions), 2023-16MPA (both actions), 2023-18 (all 7 actions), 2023-23MPA_AM (all 28 actions), 2023-33MPA_1_AM1, 2023-33MPA_3_AM1, 2023-33MPA_4_AM1, 2023-33MPA_6_AM1, 2023-33MPA_7_AM1, and 2023-34MPA (all 3 actions).

GENERAL COMMENTS ON THE MPA PETITION PROCESS

SAC acknowledges that properly cited Marine Protected Areas (MPAs). designed to protect marine life and habitats and other marine ecosystem features, are important tools; but as the Marine Life Protection Act points out, "[f]ish and other sea life are a sustainable resource, and fishing is an important community asset. MPAs and sound fishery management are complementary components of a comprehensive effort to sustain marine habitats and fisheries.[2]" Fisheries off the west coast, California in particular, are amongst the most well managed in the world and provide confidence to our passengers that the fish they are bringing home to feed their family are harvest sustainably and responsibly.

We share many of the concerns raised in the comment letter submitted by All Waters Protection & Access Coalition on or about September 19. We expand upon their Request Number 7, "Meaningfully consider socioeconomic, community and access consequences as part of determining whether a particular management action is justified."

Both the California Fish and Game Code[3] and 2016 Master Plan for MPAs[4] direct decisions regarding the siting of new MPAs consider relevant information including, but not limited to, the "socioeconomic and environmental impacts of various alternatives." We note the term "socioeconomic" does not appear anywhere in the July 31, 2026 OPC Staff Recommendations - Petitions to Adaptively Manage California's Marine Protected Area Network.[5]

SAC suggests an expansive view when considering socioeconomic impacts. Identifying and analyzing sociocultural impacts[6] should also be undertaken. Restricting the CPFV fleet from accessing important fishing grounds will negatively impact:

- <u>The many small businesses that comprise SAC membership</u>
  Without appropriate access, California's CPFV fleet would suffer. Our members are small businesses that employ captains, crews, bookkeepers, accountants, business advisors, and more. It is not hyperbole to claim the failure of a small CPFV business could result in the landing from which that vessel is based to fail. The jobs supported by that vessel and the landing would be lost.

- <u>The many small businesses that are dependent, or heavily reliant, upon our members</u>
  We also must be mindful of potential impacts to tackle shops, recreational fish processors, marine supply stores, fuel docks, and more.

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[2] Fish and Game Code Sec 2851(d)
[3] Fish and Game Code Sec 2855(c)(2)
[4] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=133535&inline (visited 9/23/26)
[5] https://opc.ca.gov/wp-content/uploads/2026/07/OPC-Recommendations-on-MPA-Petitions-July-2026-508.pdf (visited 9/23/26)
[6] For example, how human values, community traditions, social identities, etc shape how people catch, manage, and relate to fish. Instead of viewing fishing strictly as a commercial business or a biological quota, this approach recognizes that fisheries are deeply tied to human culture and community survival.

- The passengers that utilize SAC members for subsistence fishing, enjoying all that is he marine environment off the California coast
  Passengers are our lifeblood and we must be cognizant that many consider the act of harvesting their own seafood to be an important individual experience. As more fully described below, we must be mindful that the demographics of our passengers are very diverse in every facet of that word.

- The communities which benefit from the over 1 million passengers SAC members take out each year
  The local towns, cities, and ports/harbors that host our members benefit from the income and revenues generated by our passengers. Depending on location and trip type, a not insignificant number of our passengers are from out-of-state.

- Marine life in general
  Californians enjoy seafood. We consume a significant amount. Restricting our access will reduce the amount of seafood caught by passengers on CPFVs. It is reasonable to assume the demand will be satisfied by imported seafood harvested under management regimes far less restrictive than our fisheries. The export of that fishing effort will have negative impacts on marine life.

Who fishes on SAC member vessels:

As outlined above, your decisions will have far reaching consequences. In this section, we describe efforts we are undertaking to provide you with data about our passengers, who will bear a significant brunt of the impacts.

Under regulations promulgated by the United State Coast Guard, some CPFVs are required to compete and submit a passenger manifest.[7] This practice is commonplace even for those vessels which are not required to do so. A typical passenger manifest includes the name and address (including zip code) for each passenger. Our vessels also utilize an online reservation system which also collects zip code information for each individual who reserves a spot is reserved on that vessel. We recently received the following data:

- A full list of all zip codes appearing on one of our vessel's passenger manifests for June through August of this year; and;
- Information from a landing's passengers for June though August of this year.

Both the vessels and landing are based in the Santa Barbara/Ventura and would be greatly impacted by some of the Petitions in front of you. We tallied up the total number of occurrences of each zip code. We used AI to determine if that zip code had areas the State of California has been designated as disadvantaged or low-income communities[8]. The table below provides our initial findings:

[7] 46 C.F.R. §122.502

[8] This includes designations under CaEnviroScreen and SB 535 criteria

Passengers	California Passengers	Passengers from zip codes containing disadvantaged of low-income communities	% in zip codes with disadvantaged communities
1,912	1,787	876	49.02%
1,427	1,025	663	64.68%

Passengers are the total number of passengers that fished aboard that vessel in each month. We then backed out the number of passengers who were from out of state or provided an unknown or invalid zip code. Using AI, as described above, we separately counted the total number of occurrences of zip codes that contain disadvantaged or low-income communities. We then provide the percentage of our passengers that provided such zip codes.

The data clearly shows that your actions would have significant impacts on state identified disadvantaged or low-income communities. We recently obtained this information for other vessels/landings throughout the State; but wanted to highlight this to show there are nontraditional ways to assess the true socioeconomic impacts of your actions. We are planning on providing more information at your October meeting, SAC is more than happy to work with CDFW and FGC staff to help collect this information. Additionally, the data also showed a not insignificant number of passengers were from outside of California. These out-of-state passengers chose to fish on our member's vessels which provides tourism revenues to those communities while also generating license revenues for CDFW.

SAC will also be submitting Petition specific comments for your consideration.

Sincerely,

Mike Conroy
President