Chapter 8 ALTERNATIVES ANALYSIS

8.1 Introduction

This chapter describes the alternatives to the Proposed Project that were considered and evaluates their environmental impacts. The purpose of the alternatives analysis in an EIR is to describe a range of reasonable alternatives to the project that can feasibly attain most of the identified project objectives, but reduce or avoid one or more of the project's significant impacts. A more detailed description of the CEQA regulatory requirements for alternatives analysis is provided in the section immediately below. The chapter continues with a summary of the alternative development process, describes and analyzes the alternatives that were considered, and presents the alternatives that were considered but dismissed. The chapter closes with a discussion regarding the environmentally superior alternative.

8.1.1 CEQA Requirements for Alternatives Analysis

CEQA requires that an EIR evaluate a reasonable range of alternatives to the proposed project, including the No Project Alternative. The No Project Alternative allows decision makers to compare the impacts of approving the action against the impacts of not approving the action. While there is no clear rule for determining a reasonable range of alternatives to the proposed project, CEQA provides guidance that can be used to define the range of alternatives for consideration in the environmental document.

The range of alternatives under CEQA must meet most of the basic project objectives, should reduce or eliminate one or more of the significant impacts of the proposed project (although the alternative could have greater impacts overall), and must be potentially feasible. In determining whether alternatives are potentially feasible, Lead Agencies are guided by the general definition of feasibility found in the State CEQA Guidelines, Section 15364: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." In accordance with the State CEQA Guidelines, Section 15126.6(f), the lead agency should consider site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, and jurisdictional boundaries in determining the range of alternatives to be evaluated in an EIR. An EIR must briefly describe the rationale for selection and rejection of alternatives and the information that the lead agency relied on in making the selection. It should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reason for their exclusion (State CEQA Guidelines, Section 15126[d][2]). These guidelines were used in developing the alternatives and their evaluation, as described below.

8.2 Alternatives Screening Process

This section provides an overview of the alternatives screening process, including a discussion of alternatives considered in the previous stages of project development and stakeholder outreach prior to the CEQA process. Since the MLPA mandates the creation of marine protected areas (MPAs), alternatives consideration is limited to project alternatives that would meet this primary project objective. As such, variations in proposed regulations (e.g., changes in fishing quotas, seasonal restrictions) do not meet this specific mandate of the MLPA and are not considered "alternatives" for the purposes of this EIR.

8.2.1 Alternative Development

The planning process design to implement the MLPA in each MLPA study region is described in the *California Marine Life Protection Act: Master Plan for Marine Protected Areas* (MLPA Master Plan) (CDFG 2008). Specifically, the MLPA Master Plan outlines the strategies and stakeholder groups recommended for inclusion in designing the alternative MPA proposals. Incorporating a collaborative relationship with stakeholders early in the process fulfills the legislative intent of the MLPA, which provides that local communities and stakeholders have the opportunity to contribute knowledge and suggestions for monitoring, evaluating, and providing stewardship of MPAs.

Following the strategy identified in the MLPA Master Plan, potential MPA designs for the North Coast Study Region (Study Region) were developed through several iterative rounds of proposal development, evaluation and refinement, with input from members of the public, tribes, tribal communities, regional planning groups, the Department, the California Department of Parks and Recreation, and MLPA Initiative contract staff.

During the primary round of proposal development, self-organized community groups proposed eight different MPA networks that were submitted to the North Coast Regional Stakeholder Group (NCRSG). The NCRSG reviewed these proposals, as well as existing MPAs in the Study Region and other data, and underwent two additional rounds of proposal development, culminating in a single proposal submitted to the Blue Ribbon Task Force (BRTF). Based on this proposal from the NCRSG, the BRTF presented the Commission with two MPA proposals and recommendations for consideration in determining a preferred alternative. The two alternatives were the "Revised Round 3 NCRSG MPA Proposal" (RNCP) and the "BRTF Enhanced Compliance Alternative" (ECA). The Commission reviewed these proposals for feasibility and achievement of the MLPA Goals and Regional Objectives (see section 8.2.2, below), and received public input. Based on this review, the Commission developed its preferred alternative based largely on the RNCP proposal, with select modifications as outlined in Chapter 2 of this document. This preferred alternative, along with the MPA sub-options, comprise the Proposed Project. At the same time, the Commission also identified the ECA proposal as the regulatory alternative.

8.2.2 Project Goals and Objectives

As described in Chapter 2, "Project Description," the Proposed Project was developed to achieve the following MLPA goals and regional objectives:

Goal 1: To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems;

- Regional Objective 1.1: Protect and maintain species diversity and abundance consistent with natural fluctuations, including areas of high native species diversity and representative habitats.
- Regional Objective 1.2: Protect areas with diverse habitat types in close proximity to each other.
- Regional Objective 1.3: Protect natural size and age structure and genetic diversity of populations in representative habitats.
- Regional Objective 1.4: Protect natural trophic structure and food webs in representative habitats.
- Regional Objective 1.5: Promote recovery of natural communities from disturbances both natural and human induced.

Goal 2: To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted;

- Regional Objective 2.1: Help protect or rebuild populations of rare, threatened, endangered, depressed, depleted, or overfished species and the habitats and ecosystem functions upon which they rely.
- Regional Objective 2.2: Sustain or increase reproduction by species likely to benefit from MPAs and promote retention of large, mature individuals.
- Regional Objective 2.3: Sustain or increase reproduction by species likely to benefit from MPAs through protection of breeding, foraging, rearing or nursery areas or other areas where species congregate.
- Regional Objective 2.4: Protect selected species and the habitats on which they depend while allowing the commercial and/or recreational harvest of migratory, highly mobile, or other species where appropriate through the use of state marine conservation areas and state marine parks.

Goal 3: To 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;

 Regional Objective 3.1: Sustain or enhance cultural, recreational, and educational experiences and uses.

- Regional Objective 3.2: Provide opportunities for scientifically valid studies, including studies on MPA effectiveness and other research benefiting from areas with minimal or restricted human disturbance.
- Regional Objective 3.3: Provide opportunities for collaborative scientific monitoring and research projects that evaluate MPAs while promoting adaptive management and links with fisheries management, seabird and mammals information needs, classroom science curricula, cooperative fisheries research and volunteer efforts, and identify participants.

Goal 4: To protect marine natural heritage, including protection of representative and unique marine life habitats in California waters for their intrinsic value;

- Regional Objective 4.1: Include within MPAs key and unique habitats identified by the MLPA Master Plan Science Advisory Team for the North Coast Study Region.
- Regional Objective 4.2: Include and replicate to the extent practicable representatives of all marine habitats identified in the MLPA or the California MLPA Master Plan for Marine Protected Areas across a range of depths.

Goal 5: To ensure that California's MPAs have clearly defined objectives, effective management measures, and adequate enforcement, and are based on sound scientific guidelines.

- Regional Objective 5.1: Provide opportunities for interested parties to help develop objectives and ensure that each MPA is linked to one or more regional objectives.
- Regional Objective 5.2: To the extent possible, effectively use scientific guidelines in the California MLPA Master Plan for Marine Protected Areas.
- Regional Objective 5.3: Ensure public understanding of, compliance with, and stakeholder support for MPA boundaries and regulations.
- Regional Objective 5.4: Include simple, clear, and focused site-specific objectives/rationales for each MPA and ensure that site-specific rationales for each MPA reflect one or more goals and regional objectives.

Goal 6: To ensure that the state's MPAs are designed and managed, to the extent possible, as a component of a statewide network.

- Regional Objective 6.1: Ensure ecological connectivity within and between regional components of the statewide network.
- Regional Objective 6.2: Provide for protection and connectivity of habitat for those species that utilize different habitats over their lifetime.

8.2.3 Significant Environmental Impacts of the Proposed Project

The analysis of Proposed Project effects did not identify any potentially significant impacts that would require mitigation to reduce effects to a less-than-significant level or would remain unavoidable. Rather, adverse impacts were found to be *less than significant* for all resource topics and in some cases effects were determined to have *no impact*. As such, the CEQA criterion that an alternative should reduce or eliminate one or more of the significant impacts of a proposed project was not applicable to the current evaluation. Instead, the alternatives presented in this chapter were considered with the aim of further reducing any of the Proposed Project's impacts that were already found to be less than significant.

8.3 Alternatives Considered

The following two alternatives were evaluated for their potential feasibility and their ability to achieve most of the Project objectives while further avoiding, reducing, or minimizing the impacts identified for the Proposed Project. These alternatives were determined to be feasible or potentially feasible, and would generally meet the Proposed Project objectives.

- Alternative 1—No Project Alternative
- Alternative 2—ECA Alternative

Differences in the number and size of the MPAs between these alternatives and the Proposed Project are summarized in **Table 8-1**. **Table 8-2** presents the differences in the sizes of individual MPAs under existing, proposed, and alternative conditions.

Table 8-1. Summary of MPAs and Managed Areas by Type, Area, and Percentage of the North Coast

 Study Region for Existing, Proposed, and Alternative MPAs

Type of MPA or Managed Area	Existing MPAs (Alternative 1— No Project)	Proposed Project MPAs	ECA MPAs (Alternative 2)
Amount of MPA Types			
State Marine Reserve	1	6	6
State Marine Recreational Management Area	0	1	3
State Marine Park ¹	0	0	1
State Marine Conservation Area	4	13	11
Special Closures	0	7	0
Total	5	20	21
Area (mi²)			
State Marine Reserve	2.07	51.17	51.17
State Marine Recreational Management Area	0.00	0.79	1.03
State Marine Park	0.00	0	0.12
State Marine Conservation Area	1.06	84.94	81.86
Special Closures	0.00	0.19	0.00
Total	3.13	136.9	134.18
Percentage of Study Region			
State Marine Reserve	0.2	4.98	5.0
State Marine Recreational Management Area	0.0	0.08	0.1

Table 8-1. Summary of MPAs and Managed Areas by Type, Area, and Percentage of the North CoastStudy Region for Existing, Proposed, and Alternative MPAs

Type of MPA or Managed Area		Existing MPAs (Alternative 1— No Project)	Proposed Project MPAs	ECA MPAs (Alternative 2)
State Marine Park		0.0	0	<0.1
State Marine Conservation Area		0.1	8.27	8.0
Special Closures		0.0	0.02	0.0
	Total	0.3%	13.33%	13.1%

Notes: ECA = Enhanced Compliance Alternative, mi² = square statute miles, MPA = marine protected area, SMCA = state marine conservation area (in note below), SMP = state marine park (in note below), Study Region = North Coast Study Region

¹ Areas recommended by stakeholders and the Blue Ribbon Task Force as an SMP with restrictions consistent with this designation. Pursuant to California Fish and Game Commission authority (Public Resources Code 36725[a]), would be adopted as an SMCA, with a recommendation to the State Park and Recreation Commission, the designating authority for SMPs, for subsequent designation as an SMP at their discretion.

Source: Data compiled by Horizon Water and Environment in 2011

Table 8-2. Size of Individual MPAs under Existing, Proposed, and Alternative Conditions

	Size*(mi ²) of MPA				
Name of MPA	Existing MPAs (Alternative 1, No Project)	Proposed Project MPAs	ECA Alternative (Alternative 2)		
Demomid Doint SMCA		14.02	Pyramid Point Offshore SMCA	13.13	
Pyramid Point SMCA	-	14.02	Pyramid Point Nearshore SMCA	0.88	
Point St. George Reef Offshore SMCA	-	9.52	9.52		
Reading Rock SMR	-	9.57	9.57		
Reading Rock SMCA	-	11.84	11.84		
Samoa SMCA		13.02	Samoa Offshore SMCA	12.08	
Samoa SMCA	-	13.02	Samoa Nearshore SMCA	0.93	
South Humboldt Bay SMRMA	-	0.79	0.79		
South Cape Mendocino SMR	-	9.06	9.06		
Mattole Canyon SMR	-	9.76	9.76		
Sea Lion Gulch SMR	-	10.37	10.37		
Dig Elet SMCA		11.51	Big Flat Offshore SMCA	10.73	
Big Flat SMCA	-		Big Flat Nearshore SMCA	0.78	
Double Cone Rock SMCA			Vizcaino Offshore SMCA	16.79	
(previously proposed as Vizcaino SMCA)	-	18.47	Vizcaino Nearshore SMCA	1.66	
Ten Mile SMR	-	11.97	Skip Wollenberg/Ten Mile SMR	11.97	
Ten Mile Beach SMCA	-	3.54	Skip Wollenberg/Ten Mile Beach SMCA	3.53	
Ten Mile Estuary SMCA	-	0.18	Skip Wollenberg/Ten Mile Estuary SMRMA	0.18	
MacKerricher SMCA	0.72	2.40	-		
Point Cabrillo SMR	0.22	0.44	0.44		
Punta Gorda SMR	2.07	-	-		
Russian Gulch SMCA	0.09	0.21	-		

	Size*(mi ²) of MPA			
Name of MPA	Existing MPAs (Alternative 1, No Project)	Proposed Project MPAs	ECA Alternative (Alternative 2)	
Big River Estuary SMCA	-	0.12	Big River Estuary SMP ^a	0.12
Van Damme SMCA	0.02	0.05	-	
Navarro River Estuary SMCA	-	0.06	Navarro River Estuary SMRMA	0.06

Table 8-2. Size of Individual MPAs under Existing, Proposed, and Alternative Conditions

Notes: ECA = Enhanced Compliance Alternative, mi² = square statute miles, MPA = marine protected area, SMCA = state marine conservation area, SMP = state marine park, SMR = state marine reserve, SMRMA = state marine recreational management area Note that proposed special closures are not shown in this table.

^a This area was recommended by stakeholders and the Blue Ribbon Task Force as an SMP with restrictions consistent with this designation. Pursuant to California Fish and Game Commission authority (Public Resources Code 36725[a]), it would be adopted as an SMCA, with a recommendation to the State Park and Recreation Commission, the designating authority for SMPs, for subsequent designation as an SMP at their discretion.

Source: Data compiled by Horizon Water and Environment in 2011

The degree to which these alternatives reduce adverse impacts identified for the Proposed Project is discussed below and summarized in **Table 8-3**. All subject areas are analyzed for each alternative, though at a more general level than for the Proposed Project, as provided by CEQA.

Table 8-3. Alternatives Comparison Table

CEQA Resource Topic	No Project Alternative	ECA Alternative
Agriculture	+	=
Air Quality	+	=
Biological Resources	-	-
Cultural Resources	-	=
Global Climate Change	+	=
Hazards and Hazardous Materials	=	=
Land Use and Utilities	+	+
Population and Employment	+	=
Public Services	+	+
Recreation	+	+
Research and Education	-	-
Vessel Traffic	+	=
Water Quality	=	=
Environmental Justice	+	=
Cumulative Effects	-	-

Notes: CEQA = California Environmental quality Act, ECA = Enhanced Compliance Alternative

(-) Overall, the alternative would have additional adverse effects, or would be less beneficial, compared with the Proposed Project (i.e., effects would be more adverse).

(+) Overall, the alternative would have decreased adverse effects compared with the Proposed Project (i.e., effects would be more beneficial).

(=) Overall, the effects would be similar to those described for the Proposed Project.

Source: Data compiled by Horizon Water and Environment in 2011

8.3.1 Alternative 1—No Project Alternative

Characteristics of the No Project Alternative

Under the No Project Alternative, the existing MPAs in the Study Region would continue to be enforced without adjustment. As detailed in Chapter 2, "Project Description," the existing MPAs are in the southern bioregion of the Study Region; none are in the northern bioregion (see Figure 1-1). The existing MPAs established in the Study Region encompass less than 1% (or 3 square statute miles) of the Study Region's coastal waters and generally provide a low level of protection (see Tables 2-8 through 2-9). The specific regulations for the MPAs under Alternative 1 are provided in Chapter 2, Table 2-10. There are no existing special closures.

Impact Analysis

As indicated in the previous chapters of this EIR, the adverse effects of the Proposed Project are primarily a result of displacement associated with increased regulations and additional MPA areas. Under the No Project Alternative, existing Study Region conditions would instead continue and no changes to the existing baseline would result. The following is a brief description of the likely effects of implementing the No Project Alternative.

Physical Resources

Because no additional MPAs would be designated and no additional restrictions imposed, adverse direct and secondary effects on air quality, greenhouse gas emissions (GHGs), and water quality associated with displacement of fishing activities would not occur under the No Project Alternative. Similarly, no reductions in the availability of sites for future aquaculture activities would occur. However, unlike the Proposed Project, this alternative would not realize any benefits with regard to water quality that would result from the increased restrictions on development activities (e.g., sewer outfalls) within the MPAs under the Proposed Project.

Biological Resources

Although no new or increased adverse effects would result from the implementation of the No Project Alternative, benefits associated with the Proposed Project would not be realized. No additional areas of protection or regulations would be imposed; therefore, benefits to fisheries and habitats would not occur.

Cultural Resources

By maintaining the existing MPAs and regulations in the Study Region, the adverse direct and indirect impacts on cultural resources, including disturbance or loss of historical resources, traditional cultural properties and activities, and tribal practices would be avoided. However, fewer beneficial effects would be realized under the No Project Alternative, as no new areas or restrictions would occur that would otherwise provide protection for archaeological and historical resources, and sites and locations of human remains in the Study Region.

Social Resources

Unlike the Proposed Project, Alternative 1 would not result in impacts on land use or public facility conflicts, displaced vessel traffic, or demands on law enforcement and emergency response. Likewise, this alternative would have reduced adverse effects on environmental justice because no displacement of existing subsistence take activities and practices would result. Recreation would also remain unaffected under this alternative because only the currently existing MPAs and regulations would continue. However, Alternative 1 would offer no increases in protections of marine resources within the Study Region and thus would not result in any of the benefits to research and education facilities and overall recreational quality that are expected under the Proposed Project.

8.3.2 Alternative 2—BRTF Enhanced Compliance Alternative (ECA)

Characteristics of the ECA Alternative

The ECA uses the same general geographies as the MPAs in the Proposed Project, but incorporates tribal uses into the proposed state marine conservation areas (SMCAs) as described in Tribal Gathering Option 3 in Chapter 2. Four SMCAs from the Proposed Project are divided into two MPAs: (1) a nearshore SMCA (to approximately 1000 feet seaward) that allows all recreational take (i.e., available to all recreational users) proposed to accommodate traditional tribal uses, and (2) an offshore SMCA that allows a subset of those uses (uses assigned a high or moderate-high level of protection). Remaining SMCAs and state marine recreational management areas (SMRMAs) also allow a subset of proposed uses to maintain a higher level of protection. These actions were designed to increase protection levels in some of the proposed MPA areas. **Figures 8-1** and **8-2a through 8-2c** illustrates the proposed configuration of this alternative.

As described in Chapter 2, "Project Description," Alternative 2 proposes six state marine reserves (SMRs), three state marine recreational management areas (SMRMAs), one state marine park (SMP), and eleven SMCAs. As indicated in Tables 8-1 and 8-2, the overall geographic area of protection is similar to that of the Proposed Project, and the size of the individual MPAs vary only slightly from the Proposed Project. Unlike the Proposed Project, there are no special closures included in Alternative 2.

This alternative does not include take exemptions for specified federally recognized tribes; tribal take would be regulated under the same conditions as for all recreational users. In the offshore portion of the four divided SMCAs, and the other SMCAs, recreational take is established at "moderate-high" or "high" level of protection, for all recreational take, including tribal take.

In addition to incorporation of tribal take exemptions, the following major distinctions are made between the Proposed Project and Alternative 2 MPA designations:

- SMCAs at McKerricher, Russian Gulch, and Van Damme are not included under Alternative 2.
- The Big River Estuary is changed from an SMCA designation (Proposed Project) to a recommended SMP designation under Alternative 2.

- The Double Cone Rock SMCA, as described for the Proposed Project, would retain its original name (Vizcaino) under Alternative 2.
- Four SMCAs (Vizcaino, Pyramid Point, Samoa, and Big Flat) are divided into offshore and onshore SMCAs under Alternative 2, though overall boundary areas are maintained.
- Ten Mile Estuary and Navarro River Estuary are changed from an SMCA designation (Proposed Project) to an SMRMA designation under Alternative 2.
- There are no special closures included under Alternative 2.

Other than the nearshore components of the four divided SMCAs, the level of protection offered by the MPAs under Alternative 2 is mostly "very high" and "moderate-high" (see Table 2-11). Restrictions proposed under Alternative 2 are shown in **Table 8-4** (located at the end of this chapter). In general, allowed uses are similar to regulations of the Proposed Project, though Alternative 2 provides greater specificity on the recreational take methods included to accommodate tribes within the MPA areas.

Impact Analysis

A summary discussion on how these changes in regulations would have an effect on the following resource areas is provided below.

Physical Resources

Given that the overall area of protection under this alternative is similar to that of the Proposed Project and within similar geographic locations, direct and secondary effects on air quality, GHGs, and water quality associated with the proposed restrictions would not significantly differ.

Biological Resources

Fewer MPAs and no special closures are identified under Alternative 2, compared with the Proposed Project. While this slight decrease in protected area would not result in any new or increased adverse effects on biological resources, benefits associated with the protection of marine resources at these locations would not be realized.

Cultural Resources

Recreational take allowances included under Alternative 2 with the intent of accommodating tribal take are specified to a greater extent by species and gear type in the nearshore zones of the Pyramid Point, Samoa, Big Flat, and Vizcaino SMCAs, but are functionally comparable to take allowances for specified federally recognized tribes in the Proposed Project. However, the regulations for the Ten Mile Estuary SMCA and South Humboldt Bay SMRMA would no longer include tribal take compared with the Proposed Project.



Figure 8-1 Proposed Project Alternative 2

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1. Pyramid Point Offshore and Nearshore SMCAs.



3. Reading Rock SMR and Reading Rock SMCA.









2. Point St. George Reef Offshore SMCA.



4. Samoa Offshore and Nearshore SMCAs.



Figure 8-2a Proposed MPAs in Alternative 2 Page intentionally left blank



7. Mattole Canyon SMR.



9. Big Flat Offshore and Nearsgore SMCAs.



11. Skip Wollenberg/Ten Mile SMR, Skip Wollenberg/Ten Mile Beach SMCA, and Skip Wollenberg/Ten Mile Estuary SMRMA.





8. Sea Lion Gulch SMR.



10. Vizcaino Offshore and Nearshore SMCAs.





Proposed State Marine Conservation Area (SMCA) Proposed State Marine Reserve (SMR) Proposed State Marine Recreational Management Area (SMRMA)

Source: MLPAI 2010 a

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13. Big River Estuary SMP.

14. Navarro River Estuary SMRMA.

Proposed State Marine Park (SMP)

Proposed State Marine Recreational Management Area (SMRMA)

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For the specified federally recognized tribes, the differences under Alternative 2 would result in slightly greater impacts on the tribal take activities at Reading Rock SMCA and the offshore SMCAs at Pyramid Point, Samoa, Big Flat, and Vizcaino/Double Cone Rock, where a subset of recreational take allowances are included that would provide for some, but not all, of the tribal take proposed under the Proposed Project.

For non-federally recognized tribal communities, the differences under Alternative 2 would be similar to those described for recreational consumptive uses below.

Social Resources

In general, the differences under Alternative 2 with regard to consumptive uses would apply to recreational rather than commercial fishing activities. Commercial activities would remain largely unchanged with the exception of additional allowance of salmon take in the Ten Mile Beach SMCA. Additionally, Alternative 2 would not include access or take restrictions for the special closures included in the Proposed Project. As such, Alternative 2 would have slightly reduced impacts on commercial activities in the Study Region compared with the Proposed Project.

This alternative would have several differences in terms of effects on recreational consumptive uses, compared with the Proposed Project, in the following ways:

- For Pyramid Point, Point St. George Reef, Reading Rock, Samoa, Big Flat, Vizcaino/Double Cone Rock, and Ten Mile Beach MPAs, Alternative 2 would permit recreational spearfishing of certain species, while the Proposed Project would not.
- Regulations for the Big River Estuary and Navarro River MPAs under Alternative 2 would allow for the recreational take of certain fish species, which would not be permitted under the Proposed Project. These additional take provisions would result in reduced potential for adverse effects on consumptive recreational activities compared with the Proposed Project. However this alternative also has additional restrictions on recreational waterfowl take in the Big River Estuary compared with the Proposed Project.
- Additional allowance for tribal take is not anticipated to substantially affect recreational users in SMCAs under Alternative 2. Tribal take is not generally perceived as an activity that is incompatible with recreation (unlike commercial take). As such, adverse impacts on recreation associated with increased tribal take in SMCAs under Alternative 2 would be minimal.
- With regard to recreational users other than members of specified federally recognized tribes, Alternative 2 allows more liberal recreational take in the SMCAs and SMRMAs owing to the application of Tribal Option 3. Tribal Option 3 includes recreational take allowances as its mechanism to accommodate tribal harvest and gathering, whereas additional recreational take is limited to specified tribes in the Proposed Project, based on its application of Tribal Option 1.

These differences in take provisions compared with the Proposed Project would have somewhat offsetting effects, but would be specific to the particular type of recreational activity. Overall, impacts on consumptive recreational activities under Alternative 2 would remain comparable to the Proposed Project. See "Cultural Resources" above for a discussion of differences relative to tribal uses.

Alternative 2 removes the existing MPAs at MacKerricher, Van Damme, and Russian Gulch SMCAs, whereas they are retained and modified as described in the Proposed Project. However, this change in protection for these areas would have little effect on consumptive uses, as take is not restricted under the Proposed Project in these locations except for commercial harvesting of kelp. Instead, greater opportunities for commercial kelp harvesting would result under Alternative 2, as restrictions on the harvesting of kelp in these locations under the Proposed Project would not be imposed.

Alternative 2 does not include the seven special closures surrounding rocks and islands. In the Proposed Project, special closures would restrict public access and take of marine resources without exceptions for species, ethnicity, or method of take. Alternative 2 would allow public access to these areas, as is the present case under existing conditions (Alternative 1 or No Project Alternative). Alternative 2 would result in a lessened adverse effect on the commercial and subsistence fishing community, compared with the Proposed Project.

Overall, the take provisions under Alternative 2 would result in a smaller area of protection, greater recreational use allowances at certain locations, and no special closures. This decreased area of protection would have slightly less potential for adverse effects on adjacent land uses and demands on law enforcement, though benefits on research and education would decrease correspondingly. All other effects on social resources would be similar to those described for the Proposed Project.

8.4 Alternatives Considered and Dismissed from Detailed Analysis

As noted above, CEQA requires that alternatives to a proposed project meet most of the basic project objectives, reduce or eliminate one or more of the significant impacts of the proposed project, and must be feasible. As required by the MLPA Master Plan, the planning process to implement the MLPA in the Study Region included several rounds of evaluation by numerous stakeholders. The resulting proposals submitted to the Commission represent those that have been determined to most adequately meet MPA goals and objectives. As a result, the following alternatives were considered, but dismissed from detailed analysis:

RNCP Proposal that Preceded the Proposed Project. The RNCP proposal that was developed in advance of the finalization of the Proposed Project was not considered to be a true alternative because it would be substantially similar to the Proposed Project. As a result, it would not substantially reduce any of the impacts of the Proposed Project. Therefore, this proposal has been dismissed from consideration.

- Other Stakeholder Proposals. The stakeholder involvement process resulted in other proposals that were widely supported and developed to have minimal adverse impacts on the communities and environmental resources within the Study Region. However, the differences in effects between these proposals and the Proposed Project were not considered to be substantial enough to warrant detailed consideration.
- Alternative MPA Configurations. The configuration of the MPAs under the Proposed Project (i.e., their geographic locations and extent) was developed in part to minimize the potential adverse socioeconomic effects of MPA designation. Since socioeconomic effects are not considered impacts under CEQA without a nexus to physical effects, it was concluded that alternative MPA configurations would not offer substantial reductions in adverse impacts compared with those of the Proposed Project and did not warrant detailed analysis.
- Alternatives to MPA Designations. As mentioned above, alternatives that involve different methods of protecting marine resources besides designation of MPAs were not considered, because they would not be consistent with the requirements of the MLPA.
- Alternatives Extending beyond the North Coast Study Region. Each of the five study regions has conducted its own alternatives analysis based on the conditions and resources present within each respective region. The consideration of alternatives to the statewide network of MPAs as a whole has been determined to be unnecessary. The development process was not anticipated to result in alternatives that would be unique or different from those developed for each individual study region or offer substantially reduced environmental effects.

8.5 Environmentally Superior Alternative

CEQA requires that an environmentally superior alternative be selected from among the alternatives to the Proposed Project. CEQA does not provide a definition for the environmentally superior alternative; in general, however, the environmentally superior alternative is defined as that alternative with the least adverse environmental impacts on the project site and its surrounding environment. Neither of the alternatives, nor the Proposed Project, would result in significant impacts on the environment. Therefore, the identification of the environmentally superior alternative focuses on the relative degree of less-than-significant impacts, as well as the relative degree of potential environmental benefit associated with each alternative as compared with the Proposed Project.

In the short term, Alternative 1 (No Project Alternative) would result in the least amount of fishing displacement and would have a reduced impact on a wide range of resources, including law enforcement demands, potential conflicts with land uses, recreational displacement, cultural practices, and socioeconomic effects, among others. However, in the long term, Alternative 2 (ECA Alternative) would provide greater habitat protection offshore and thus would provide a greater potential benefit to populations of marine species in the Study Region. The greater net benefit to biological resources from increased regulations within MPAs would offset the slightly adverse effects associated with

displacement. Overall, the increase in restrictions would likely result in a healthier sustainable fishery population, which would reduce the overall distance from offshore MPA boundaries fishermen would need to travel for available marine resources. As such, considering all factors, including both short-term and long-term effects, for the purposes of CEQA, Alternative 2 is considered to be the environmentally superior alternative to the No Project Alternative.

MPA Name & Designation	MPA Boundaries (Exact or Approximate)	Level of Protection (LOP)*	Proposed Allowable Uses (Take Regulations)
Pyramid Point Offshore SMCA	This area is bounded by straight lines connecting the following points in the order listed except where noted: 42° 00.000' N. lat. 124° 13.000' W. long.; 42° 00.000' N. lat. 124° 19.815' W. long.; thence southward along the three nautical mile offshore boundary to 41° 57.500' N. lat. 124° 17.100' W. long.; 41° 57.500' N. lat. 124° 12.700' W. long.; 41° 59.000' N. lat. 124° 12.700' W. long.; and 42° 00.000' N. lat. 124° 13.000' W. long.	Moderate High	 The take of all living marine resources is prohibited except: 1. The recreational take of pelagic finfish except salmon by spearfishing; surf and night smelt by cast net; and surf and night smelt by dip net. 2. The recreational take, intended to accommodate tribal uses, of: surf smelt, herring, anchovy (DIP NET OR CAST NET).
Pyramid Point Nearshore SMCA	This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed: 42° 00.000' N. lat. 124° 12.734' W. long.; 42° 00.000' N. lat. 124° 13.000' W. long.; 41° 59.000' N. lat. 124° 12.700' W. long.; 41° 57.500' N. lat. 124° 12.700' W. long.; and 41° 57.500' N. lat. 124° 12.421' W. long.	Low	The take of all living marine resources is prohibited except: 1. The recreational take of pelagic finfish except salmon by spearfishing; surf and night smelt by cast net; and surf and night smelt by dip net. 2. The recreational take, intended to accommodate tribal uses, of: • finfish (HOOK AND LINE FROM SHORE ONLY); • shiner surfperch, surf smelt, top smelt, herring, anchovy and sculpin (DIP NET OR CAST NET); • surf smelt (BEACH NET): • marine invertebrates (includes clams, mussels, other bivalves, sea urchins) (HAND); and • marine aquatic plants (except for sea palm) (HAND).
Point St. George Reef Offshore SMCA	North Boundary: 41 52'00 West Boundary: The State Water Boundary South Boundary: 41 49'00 East Boundary: 124 23' 11.335" - in line with navigational buoy	Moderate High	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; and Dungeness crab by trap. 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; and Dungeness crab by trap.
Reading Rock SMR	North Boundary: 41°20.1' N West Boundary: State Waters South Boundary: 41°17.6' N East Boundary: 124° 10.0' W	Very High	Take of all living marine resources is prohibited.

MPA Name & Designation	MPA Boundaries (Exact or Approximate)	Level of Protection (LOP)*	Proposed Allowable Uses (Take Regulations)
Reading Rock SMCA	North Boundary: 41°20.1' N West Boundary: 124° 10.0' W South Boundary: 41°17.6' N - north side of Redwood Creek East Boundary: Eastern study region boundary	Moderate High	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; Dungeness crab by trap; and surf and night smelt by dip and cast nets (comm). 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by diving; Dungeness crab by hoop net; Dungeness crab by trap; surf and night smelt by cast net; and surf and night smelt by dip net. 3. The recreational take, intended to accommodate tribal uses, of: Pacific lamprey (HOOK AND LINE OR BOW AND ARROW); trout (except steelhead rainbow trout) (HOOK AND LINE); pelagic finfish (including anchovy), sardine, mackerel, salmon, and billfishes (6 species)) (TROLL); California halibut, other flatfish (7 species), billfishes (6 species) and Pacific lamprey (SPEARFISHING); anchovy, sardine, mackerel (2 species) and Pacific lamprey (HAND); and sharks (7 species), ray and skates (2 species) (SPEAR, HARPOON OR BOW AND ARROW); surf smelt, herring and anchovy (DIP NET OR CAST NET); eulachon (DIP NET); Dungeness crab (TRAP OR HOOP NET); and market squid (HOOK AND LINE, DIP NET OR CAST NET).
Samoa Offshore SMCA	This area is bounded by straight lines connecting the following points in the order listed except where noted: 40° 55.000' N. lat. 124° 08.700' W. long.; 40° 55.000' N. lat. 124° 12.677' W. long.; thence southward along the three nautical mile offshore boundary to 40° 52.000' N. lat. 124° 14.225' W. long.; 40° 52.000' N. lat. 124° 10.100' W. long.; and 40° 55.000' N. lat. 124° 08.700' W. long.	Moderate High	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; Dungeness crab by trap; and surf and night smelt by dip and cast nets (comm). 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by diving; Dungeness crab by hoop net; Dungeness crab by trap; surf and night smelt by cast net; and surf and night smelt by dip net. 3. The recreational take, intended to accommodate tribal uses, of:

MPA Name &	MPA Boundaries	Level of Protection	Proposed Allowable Uses
Designation	(Exact or Approximate)	(LOP)*	(Take Regulations)
			 coastal pelagic finfish, and Pacific lamprey (HOOK AND LINE); pelagic finfish (except salmon) and Pacific lamprey
			(SPEARFISHING);
			 sharks (2 species), ray and skates (2 species) (SPEAR OR HARPOON);
			 anchovy (DIP NET OR CAST NET);
			 eulachon (DIP NET); and
			 Dungeness crab (TRAP OR HOOP NET).
Samoa Nearshore SMCA	This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed: 40° 55.000' N. lat. 124° 08.432' W. long.; 40° 55.000' N. lat. 124° 08.700' W. long.; 40° 52.000' N. lat. 124° 10.100' W. long.; and 40° 52.000' N. lat. 124° 09.800' W. long.	Moderate Low	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; Dungeness crab by trap; and surf and night smelt by dip and cast nets (comm). 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by diving; Dungeness crab by hoop net; Dungeness crab by trap; surf and night smelt by cast net; and surf and night smelt by dip net. 3. The recreational take, intended to accommodate tribal uses, of: rockfish, cabezon, lingcod, greenling (2 species), California halibut, flatfishes (5 species), white sturgeon, sharks (2 species), ray and skates (2 species), pelagic finfish, and Pacific lamprey (HOOK AND LINE); rockfish, cabezon, lingcod, greenling (2 species), pelagic finfish, and Pacific lamprey (HOOK AND LINE);
			 sharks (2 species), ray and skates (2 species) (SPEAR OR HARPOON); shiner surfperch, surf smelt, and anchovy (DIP NET OR
			CAST NET);
			 eulachon (DIP NET); intertidal snails, clams (3 species) and cockles (2 species) (HAND); and

MPA Name & Designation	MPA Boundaries (Exact or Approximate)	Level of Protection (LOP)*	Proposed Allowable Uses (Take Regulations)
			• Dungeness crab (TRAP OR HOOP NET).
South Humboldt Bay SMRMA	North Boundary: north latitude 40 43.0 West Boundary: mean high high tide South Boundary: north latitude 40 42.0 East Boundary: west longitude 124 15.00	Very High	Take of all living marine resources is prohibited. Waterfowl hunting allowed.
South Cape Mendocino SMR	North Boundary: 40 26.1 N West Boundary: the state water boundary South Boundary: 40 24.9 N East Boundary: mean high tide line	Very High	Take of all living marine resources is prohibited.
Mattole Canyon SMR	North Boundary: North latitude 40 20.00 N to the extent of state waters West Boundary: The state water boundary South Boundary: North latitude 40 17.00 N to the extent of state waters East Boundary: 124 22.50 N	Very High	Take of all living marine resources is prohibited.
Sea Lion Gulch SMR	North Boundary: 40 14.4 N West Boundary: State water boundary South Boundary: 40 12.8 N East Boundary: Mean high tide line	Very High	Take of all living marine resources is prohibited.
Big Flat Offshore SMCA	This area is bounded by straight lines connecting the following points in the order listed except where noted: 40° 09.400' N. lat. 124° 13.000' W. long.; 40° 09.400' N. lat. 124° 19.367' W. long.; thence southward along the three nautical mile offshore boundary to 40° 07.500' N. lat. 124° 16.204' W. long.; 40° 07.500' N. lat. 124° 10.700' W. long.; 40° 07.700' N. lat. 124° 11.500' W. long.; and 40° 09.400' N. lat. 124° 13.000' W. long.	Moderate High	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; and Dungeness crab by trap. 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by hoop net; Dungeness crab by diving; and Dungeness crab by trap. 3. The recreational take, intended to accommodate tribal uses, of: salmon (TROLL); Pacific lamprey (SPEARFISHING OR BOW AND ARROW); surf smelt, herring (DIP NET OR CAST NET); and eulachon (DIP NET).
Big Flat Nearshore SMCA	This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed:	Low	The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; and Dungeness crab by trap.

MPA Name & Designation	MPA Boundaries (Exact or Approximate)	Level of Protection (LOP)*	Proposed Allowable Uses (Take Regulations)
	40° 09.400' N. lat. 124° 12.687' W. long.; 40° 09.400' N. lat. 124° 13.000' W. long.; 40° 07.700' N. lat. 124° 11.500' W. long.; 40° 07.500' N. lat. 124° 10.700' W. long.; and 40° 07.500' N. lat. 124° 10.300' W. long.		 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by hoop net; Dungeness crab by diving; and Dungeness crab by trap. 3. The recreational take, intended to accommodate tribal uses, of: rockfish, cabezon, lingcod, sculpin, salmon and stickleback (HOOK AND LINE); Pacific lamprey (SPEARFISHING OR BOW AND ARROW); surf smelt, shiner surfperch, herring (DIP NET OR CAST NET); eulachon (DIP NET); octopus (3 species), purple shore crab and bay and ghost shrimp (HAND); red abalone, black and brown turban snails, limpets (3 species), clams and cockles, mussels, oysters, scallops, and urchin (2 species)(HAND); and giant kelp, bull kelp and other marine aquatic plants (except for sea palm) (HAND).
Vizcaino Offshore SMCA	This area is bounded by straight lines connecting the following points in the order listed except where noted: 39° 48.500' N. lat. 123° 51.000' W. long.; 39° 48.500' N. lat. 123° 56.043 W. long.; thence southward along the three nautical mile offshore boundary to 39° 44.300' N. lat. 123° 54.345' W. long.; 39° 44.300' N. lat. 123° 50.600' W. long.; 39° 47.300' N. lat. 123° 50.600' W. long.; and 39° 48.500' N. lat. 123° 51.000' W. long.	Moderate High	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; and Dungeness crab by trap. 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by hoop net; Dungeness crab by diving; and Dungeness crab by trap. 3. The recreational take, intended to accommodate tribal uses, of: Pacific lamprey (HOOK AND LINE, SPEARFISHING OR BOW AND ARROW); trout (except steelhead rainbow trout) (HOOK AND LINE); salmon (TROLL); surf smelt, herring and anchovy (DIP NET OR CAST NET); eulachon (DIP NET); anchovy, sardine and mackerel (2 species) (HAND);

MPA Name &	MPA Boundaries	Level of Protection	Proposed Allowable Uses
Designation	(Exact or Approximate)	(LOP)*	(Take Regulations)
			 Dungeness crab (TRAP OR HOOP NET).
Vizcaino Nearshore SMCA	This area is bounded by the mean high tide line and straight lines connecting the following points in the order listed: 39° 48.500' N. lat. 123° 50.725' W. long.; 39° 48.500' N. lat. 123° 51.000' W. long.; 39° 47.300' N. lat. 123° 50.600' W. long.; 39° 44.300' N. lat. 123° 50.600' W. long.; and 39° 44.300' N. lat. 123° 50.061' W. long.	Low	 The take of all living marine resources is prohibited except: 1. The commercial take of salmon by troll; and Dungeness crab by trap. 2. The recreational take of pelagic finfish except salmon by spearfishing; salmon by troll; Dungeness crab by hoop net; Dungeness crab by diving; and Dungeness crab by trap. 3. The recreational take, intended to accommodate tribal uses, of: rockfish, cabezon, greenling (2 species), lingcod, sculpin, California halibut, Pacific halibut, salmon, stickleback, trout (except steelhead rainbow trout) and Pacific lamprey (HOOK AND LINE); redtail surfperch and other surfperch (HOOK AND LINE FROM SHORE); shiner surfperch, surf smelt, herring and anchovy (DIP NET OR CAST NET); eulachon (DIP NET); anchovy, sardine and mackerel (2 species) (HAND); red abalone, black and brown turban snails, limpets (2 species), clams (11 species) and cockles (2 species), mussels, oysters, scallops and urchin (2 species) (HAND); market squid (DIP NET OR CAST NET); Dungeness crab, other crabs (yellow, rock, red, slender and purple shore) (TRAP OR HOOP NET); oconstripe shrimp and spot prawn (TRAP); octopus (3 species) and bay and ghost shrimp (HAND); and giant kelp, bull kelp, turf-forming and foliose algae (except for sea palm) (HAND).
Skip Wollenberg/ Ten Mile SMR	Northern boundary: 39 35.9 Southern Boundary: 39 33.3 East: Mean high tide line West: State waters	Very High	Take of all living marine resources is prohibited.

		Level of	
MPA Name &	MPA Boundaries	Protection	Proposed Allowable Uses
Designation Skip Wollenberg/ Ten Mile Beach SMCA	(Exact or Approximate) North: 39 33.3 South: 39 32.5 East: Mean high tide line West: State waters	(LOP)* Low	(Take Regulations) The take of all living marine resources is prohibited except: The commercial take of Dungeness crab by trap. The recreational take of pelagic finfish except salmon by spearfishing; Dungeness crab by hoop net; Dungeness crab by diving; and Dungeness crab by trap. The recreational take, intended to accommodate tribal uses, of: rockfish, cabezon, greenling (2 species), lingcod, sculpin, California halibut, Pacific halibut, stickleback, trout (except steelhead rainbow trout) and Pacific lamprey (HOOK AND LINE); redtail surfperch and other surfperch (HOOK AND LINE FROM SHORE); shiner surfperch, surf smelt, herring and anchovy (DIP NET OR CAST NET); eulachon (DIP NET); anchovy, sardine and mackerel (2 species) (HAND); Pacific lamprey (SPEARFISHING OR BOW AND ARROW); octopus (3 species) and bay and ghost shrimp (HAND); red abalone, black and brown turban snails, limpets (2 species), clams (11 species) and cockles (2 species), mussels, oysters, scallops and urchin (2 species) (HAND); market squid (DIP NET OR CAST NET); Dungeness crab and other crabs (yellow, rock, red, slender and purple shore) (TRAP OR HOOP NET); coonstripe shrimp and spot prawn (TRAP); and giant kelp, bull kelp, turf-forming and foliose algae (except for sea palm) (HAND). No wave energy projects or oil exploration/leases.
Skip Wollenberg/ Ten Mile Estuary	From the mouth of Ten Mile River (abuts Ten Mile SMCA) inland to the west bank of the south fork of the Ten Mile.	Very High	Take of all living marine resources is prohibited. Waterfowl hunting is allowed.

MPA Name & Designation SMRMA	MPA Boundaries (Exact or Approximate)	Level of Protection (LOP)*	Proposed Allowable Uses (Take Regulations)
Point Cabrillo SMR	Southern boundary = 39° 20.600' Northern boundary = 39° 21.400' Western boundary = 123° 50' East boundary = Mean high tide line	Very High	Take of all living marine resources is prohibited.
Big River Estuary SMP	Seaward boundary is east side of the highway 1 bridge and MPA extends inland to the State Parks boundary.	Moderate	 The take of all living marine resources is prohibited except: 1. The recreational take of surfperch by hook and line from shore; Dungeness crab by hoop net; and Dungeness crab by diving. 2. The recreational take, intended to accommodate tribal uses, of: Pacific lamprey (SPEARFISHING OR BOW AND ARROW); eulachon (DIP NET); surf smelt, anchovy and herring (DIP NET OR CAST NET); anchovy, sardine and mackerel (2 species) (HAND); Dungeness crab, (HOOP NET OR TRAP); and market squid (DIP NET OR CAST NET).
Navarro River Estuary SMRMA	Mouth of the estuary to the west side of the Hwy 1 bridge	Moderate	 The take of all living marine resources is prohibited except: 1. The recreational take of salmon by hook and line and salmonids (HOOK AND LINE). 2. The recreational take, intended to accommodate tribal uses, of: Pacific lamprey (SPEARFISHING OR BOW AND ARROW); eulachon (DIP NET); surf smelt, anchovy and herring (DIP NET OR CAST NET); anchovy, sardine and mackerel (2 species) (HAND); Dungeness crab, (HOOP NET OR TRAP); and market squid (DIP NET OR CAST NET).
			Waterfowl hunting is allowed.

* The preliminary level of protection assigned to the MPAs listed are considered as draft. They have not been reviewed or approved by the MLPA Master Plan SAT.

Source: MLPAI 2010b