



December 4, 2025

Wade Crowfoot, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Public Comment re Ocean Protection Council's Draft Strategic Plan, Objective 2.1.2

The Tribal Marine Stewards Network (TMSN) is an alliance of Tribal Nations working collaboratively to steward, protect, and restore our ocean and coastal spaces within ancestral territories. For over five years, both the TMSN and the State have worked together to strengthen our relationship and to build an increased understanding of the vision and goals of the Network. The Tribes of the Network are so appreciative of the State's collaboration, support, and partnership. We are also incredibly pleased to see that the TMSN has been included in the Ocean Protection Council's 2026-2030 Draft Strategic Plan, which demonstrates an ongoing commitment to this important partnership and our work.

Objective 2.1 of the draft plan calls for OPC to strengthen partnerships with California's Native American Tribes, and we fully support OPC's effort to maximize stewardship through this objective. Objective 2.1.2, however, raises concerns for us as we were not adequately consulted about whether or not the Tribes of the TMSN were amenable to taking on three new Tribes. Objective 2.1.2 currently reads, "By 2028, support the continued success and growth of the Tribal Marine Stewards Network by providing funding to further scale up the Network, with at least three new tribes participating."

While we applaud OPC's belief in us, we are committed to growing at a pace that ensures long term sustainable success and including Tribal Nations that are deeply committed to the vision and spirit of collaboration of the TMSN. Quality of involvement and the impact of the work is much more important to us than the quantity of Tribes participating. Similarly, we must also first ensure sustainability of the six (6) Tribes that have already demonstrated that commitment.

Therefore, we would like to propose the following language and request that Objective 2.1.2 be amended to read: "By 2030, support the continued success and growth of the Tribal Marine Stewards Network by providing funding to sustain the existing six member Tribes and further scale up the



Network, with up to three new Tribes participating.” We feel this amendment meets the goals and intent of both the TMSN member Tribes and OPC.

The Tribal Marine Stewards Network is an alliance of Tribal Nations, so we must defer to each individual Tribal Nation on decisions related to the function and growth of the Network. At present, our growth strategy prioritizes deepening commitment and success among existing member Tribes before expanding to include new Tribes. Growth is already happening internally—through strengthened collaborations between Tribes, increased staff capacity and engagement, consistent participation in Network goals and deadlines, and robust outreach and education both within and outside Tribal communities. Most importantly, our growth must center on the next generation, ensuring Tribal youth are engaged as future stewards and leaders.

We want to emphasize that expansion by adding additional Tribes to the TMSN is not the only form of growth. Our collective capacity, shared knowledge, and collaborative power grow stronger every day through the work we do together. The Network also sees opportunities to expand its impact by sharing knowledge, monitoring tools, protocols, and frameworks with additional Tribes. Moreover, there is a need to deepen our relationship with the State, including how our work relates to the MPA Network and the work of the Ocean Protection Council.

When considering new member Tribes, the TMSN will only grow through true partnership and alignment with the existing vision and goals—meaning Tribes come to consensus together about membership. Any expansion must include committed state funding that strengthens the entire Network without creating competition or detriment to current member Tribes. Finally, we believe our proposed language to amend Objective 2.2.1 meets the needs of both the TMSN Tribes and OPC. We thank you for your consideration and look forward to our continued partnership in this work that means so much to us all.

Sincerely,

The Leadership Council of the Tribal Marine Stewards Network



GREATER FARALLONES ASSOCIATION

December 8, 2025

Jenn Eckerle
Executive Director
California Ocean Protection Council
Sent via email: COPCpublic@resources.ca.gov

RE: Comments on agenda items 4 and 6b

Dear Jenn Eckerle,

The Greater Farallones Association (GFA) appreciates the opportunity to provide comments on agenda items **4 and 6b** of the **December Ocean Protection Council meeting**. As the nonprofit partner to NOAA dedicated to the conservation of the Greater Farallones, Cordell Bank, and northern Monterey Bay National Marine Sanctuaries, GFA advances coordinated science, restoration, policy, management, and community engagement to support a healthy and resilient California coast. Through collaborative partnerships, GFA facilitates innovative and cost-effective initiatives that strengthen coastal resilience and restore critical ecosystems. We offer the following comments in the spirit of collaboration and shared stewardship.

Agenda Item 4 - Consideration and Approval of the 2026-2030 Ocean Protection Council Strategic Plan

We applaud OPC for presenting a robust, science-based roadmap and are excited that it aligns closely with GFA's mission to conserve the magnificent ecosystems along California's coastline and offshore, and to foster a thriving coastal and ocean environment for generations to come. The Plan's comprehensive vision, centered on resilience, equity, biodiversity, stewardship, and a sustainable blue economy, is essential to safeguarding California's coast and ocean amid accelerating climate, ecological, and social challenges. GFA is poised to contribute towards achieving OPC's vision for California.

GFA's work strongly aligns with OPC's Strategic Plan (the Plan) **Goal 1: Building resilience to climate change, sea-level rise, coastal storms, erosion, and flooding**. GFA restores and revitalizes critical nearshore habitats (including kelp forests, coastal dune habitats, and wetlands) that provide natural coastal defenses and ecological buffering. This work helps strengthen ecosystem resilience, which advances OPC's objective to safeguard coastal and marine ecosystems and communities.

Objective 1.1: Advancing Sea-Level Rise Adaptation. We strongly encourage the Ocean Protection Council to leverage the North-central California Coastal Sediment Coordination Committee as a key partner in achieving Objective 1.1. The Committee - a collaborative of 17 local, state, and federal agencies - provides a proven, collaborative framework for interagency



coordination and has made meaningful progress toward several of the Objective 1.1 targets along California's north-central coast.

To help identify beaches and habitats most at risk, we recommend that OPC draw on the Committee's existing infrastructure, use the long-term shoreline monitoring data from the Beach Watch and MPA Watch programs, and incorporate cutting-edge modeling tools under development by GFA and USGS. These tools can greatly enhance the State's ability to prioritize cost-effective, climate-resilient solutions.

GFA would be pleased to support OPC in scaling the Committee's successful regional model to additional geographies across California, helping ensure coordinated, science-driven sediment management and adaptation planning statewide.

Objective 1.2: Limit causes and impacts of ocean acidification, hypoxia, and harmful algal blooms. We strongly support this objective and encourage OPC to leverage data collected through NOAA climate monitoring projects and the Applied California Current Ecosystem Studies (ACCESS) project.

GFA's commitment to environmental education, public outreach, and fostering a diverse community of informed ocean stewards aligns with the OPC Strategic Plan **Goal 2: Maximizing community benefits and stewardship**. Our programs engage youth, volunteers, educators, scientists, and the public in meaningful conservation action. This shared emphasis on outreach, inclusion, and community-driven conservation is vital for the long-term success of state-level strategies.

Objective 2.2: Strengthening Engagement with Underserved Communities. We encourage OPC to partner with California's National Marine Sanctuaries to leverage proven, community-centered programs - such as LiMPETS (Long-term Monitoring Program and Experiential Training for Students) - to advance Objective 2.2. The statewide LiMPETS program provides meaningful, place-based opportunities for youth, particularly in underserved communities, to engage directly with their local coastline and participate in hands-on scientific monitoring. Programs like LiMPETS will yield exponential impact, strengthening coastal stewardship, expanding access to scientific learning, and empowering the next generation of ocean leaders.

Target 2.3.2: Improving Understanding of Coastal Access. To support progress on Target 2.3.2, we encourage OPC to leverage existing work, such as GFA's data-driven coastal access project, which uses aggregated cell phone mobility data to better understand how different communities experience and access the coast, as well as Beach Watch and MPA Watch, as their community science data continues to shed light on human activities along our coastline. These types of projects provide a powerful, scalable tool for identifying disparities, informing equitable access strategies, and guiding investment where it is most needed.



Target 2.3.3: Provide recreational and commercial fishing experiences for underserved youth. To support progress on Target 2.3.3, we encourage OPC to partner on programs such as NOAA's Fisherman in the Classroom, which supports bringing local commercial fishermen and women into classrooms to teach students about the rich cultural history and current-day relevance of commercial fishing in California.

Under the Plan's **Goal #3: To safeguard coastal and marine biodiversity**, GFA's decades-long dedication to conserving sanctuary habitats, tracking species health, restoring kelp ecosystems, supporting recovery efforts, and engaging in science-based stewardship dovetails directly with OPC's ambitions. In particular, GFA's kelp-restoration programs and habitat restoration efforts help realize the Plan's targets to restore degraded ecosystems, support species recovery, and maintain ecological productivity.

Target 3.1.2: Partnering with National Marine Sanctuaries. We strongly support OPC's goal to partner with the Office of National Marine Sanctuaries to implement policy, management, or funding actions that enhance biodiversity across sanctuary waters. GFA stands ready to assist OPC and sanctuary leadership in identifying and implementing actions that meaningfully strengthen protections within these nationally significant ecosystems.

Target 3.3.2: Statewide Kelp Restoration and Management Plan. We strongly support OPC's commitment to complete the statewide Kelp Restoration and Management Plan by 2027 and to restore at least 500 acres of kelp forest by 2030. As the author of the Sonoma-Mendocino Bull Kelp Recovery and Restoration Plan, GFA encourages OPC to integrate regional lessons learned, Tribal partnerships, and long-term monitoring data into the statewide plan. The Greater Farallones Kelp Restoration Program's collaborative work with sanctuaries, CDFW, Tribes, researchers, and commercial divers offers a strong foundation for scaling effective restoration approaches.

GFA is well-positioned to partner with OPC and CDFW to complete the statewide plan and contribute to the 500-acre restoration target. We are currently actively restoring 27 acres of strategically selected kelp forests using grazer suppression and innovative outplanting techniques. With strong coordination, continued investment, and support for regional practitioners, California can make meaningful progress toward restoring these critical ecosystems for wildlife, Tribal and coastal communities, and future generations.

Target 3.3.3: Restoring Coastal Wetlands, Native Oyster Beds, and Eelgrass Meadows. We strongly support OPC's targets to restore 7,000 acres of coastal wetlands, 100 acres of native oyster beds, and 200 acres of eelgrass meadows by 2030. To advance this work efficiently, we request that OPC consult with the interagency North-central California Coastal Sediment

San Francisco Bay Conservation and Development Commission

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December 8, 2025

Wade Crowfoot, Chair
Ocean Protection Council
715 P St., 20th Floor
Sacramento, CA 95814

SUBJECT: Ocean Protect Council 2026-20230 Strategic Plan

Dear Chair Crowfoot,

Thank you for the opportunity to comment on the Ocean Protection Council's (OPC) 2026 through 2023 Strategic Plan. The San Francisco Bay Conservation and Development Commission (BCDC) and the Ocean Protection Council have long partnered in protecting California's vital natural resources, with our focused efforts on coastal zone management and, specifically, San Francisco Bay for people and nature to thrive together. Through our partnership we have enjoyed collaborating on policy issues, including adaptation to rising seas, habitat restoration and protection, and using planning and implementation mechanisms to support our joint goals, including regional planning efforts, wetland restoration, and beneficial reuse of sediment otherwise wasted. Through this partnership, our efforts have been supported by OPC funding, for which we are very grateful.

BCDC fully supports the adoption of OPC 2026-2030 Strategic Plan, and its four goals, as increasing ocean and coastal health and increasing equity and inclusion benefits all Californians and the Nation. Objectives included in these goals specifically speak to BCDC's mission, i.e., "The San Francisco Bay Conservation and Development Commission protects and enhances San Francisco Bay and advances the Bay's responsible, productive, and equitable uses—for today and for generations to come—as we face a changing climate and rising sea levels."

OPC's first, goal, "Build Resilience to Climate Change" and specifically, Objective 1.1: "Protect communities and ecosystems from the impacts of sea level rise, coastal storms, erosion, and flooding," with a focus on sea level rise guidance updates, subregional sea level rise plan development and implementation, recreation areas, and groundwater and contaminated sites, are aligned with BCDC's current efforts. In fact, the OPC has significantly funded BCDC's work in these areas through Senate Bill 1 grant program. It has dedicated crucial funding to Bay Area jurisdictions. BCDC has partnered with OPC on designing a grant program that aligns with BCDC's Regional Shoreline Adaptation Plans and includes groundwater and contamination as a critical issue of regional significance.



With both our planning and regulatory programs we look forward to OPC's 2029 updates to the California Sea Level Rise Guidance to provide consistent, best available science to that supports regional adaptation planning and project implementation. This information helps us assess where human, natural, and restored projects maybe be vulnerable as waters rise.

BCDC also appreciates Objective 1.1.5: "By 2028, leverage existing efforts and collaborate with partner agencies and others to develop a statewide strategy and guidance to support sediment management and beneficial reuse of dredged materials for coastal adaptation and resiliency projects." BCDC has long been a leader in this issue in the Bay Area and has supported beneficial reuse of sediment for wetland restoration and other uses, resulting in over 30 million cubic yards of beneficial reuse in San Francisco Bay. BCDC's Sediment for Wetlands Adaptation Project is a great example of this objective, which has identified barriers and challenges, as well as potential solutions, to increase beneficial reuse in the Bay Area. Because this issue is important statewide, we applaud the OPC in expanding the discussion and coordination to the larger state, and acknowledges the importance of regional differences in the state.

BCDC fully supports OPC's second goal, "Advance equity across ocean and coastal policies and actions," as it has similar policies that promote environmental and social equity. Working with this goal, BCDC has expanded its equity programming and developed an Environmental Justice Advisors program, and requires equitable community engagement on large projects that would affect vulnerable and disadvantaged communities. BCDC has created and implemented a Bay Shoreline Academy that brings youth and adults interested in the intersection of policy and environmental justice into a supportive learning environment. Our public access program ensures people from all communities have an opportunity to explore and recreate along and in San Francisco Bay. Therefore, we encourage and are willing partners in supporting Objective 2.1 "Expand engagement with underserved communities;" Objective 2.3, "Increase safe and equitable access to the coast," and Objective 2.5, "Enhance public outreach, understanding, and awareness."

BCDC and the OPC are well aligned in our goals and efforts. We very much appreciate the funding and policy support that OPC has provided over the years. As OPC moves forward with its updated Strategic Plan, we support and applaud its efforts and stand ready to work with you on all of these tasks.

Sincerely,

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Lawrence J. Goldzband
Executive Director





Coordination Committee (the Committee). The Committee has identified high-priority restoration projects and developed collaborative processes for project selection, streamlined permitting, and beneficial sediment reuse - tools that can significantly accelerate progress toward these statewide goals. GFA would welcome the opportunity to support OPC in leveraging this successful regional model to advance habitat restoration across California.

GFA also recommends OPC consult with the Greater Farallones National Marine Sanctuary (GFNMS) on native oyster bed and eelgrass meadow restoration. The Sanctuary Advisory Council has forwarded recommendations for native oyster bed restoration in the sanctuary, and GFNMS has implemented a passive eelgrass meadow restoration program in Tomales Bay.

The Plan emphasizes science-driven policymaking, monitoring of ecosystem health, and use of indicators to guide management. GFA's role - collecting long-term ecological data, conducting community science, and participating in collaborative research initiatives such as regional marine-ecosystem studies - supports that same foundation. Our work helps fill data gaps and provides on-the-ground evidence to inform adaptive management, exactly the kind of community-science and stewardship OPC calls for.

For these reasons, **GFA strongly supports Item 4.** As a committed steward and partner, GFA stands ready to support OPC's implementation through continued habitat restoration, monitoring, community engagement, and collaboration.

Agenda Item 6b - Consideration and Approval of Disbursement of Funds for the Senate Bill 1 (SB 1) Sea Level Rise Adaptation Planning Grant Program

GFA coordinates the North-central California Coastal Sediment Coordination Committee (the Committee), a state-federal-local partnership of 17 agencies working across 300 miles of shoreline, representing nearly a quarter of California's coast. The Committee provides an essential forum for interagency coordination, shared science, and implementation of coastal resilience projects at scale.

GFA strongly supports OPC's proposed SB 1 disbursements and sees clear alignment with the Committee's mission. These investments will strengthen regional coordination and directly benefit local agencies that rely on the Committee's technical expertise, monitoring data, and collaborative permitting and project-development processes.

Sonoma County's recent and expanded engagement illustrates this value. As the County ramps up coastal resilience planning, it has turned to the Committee for connections to state partners, technical review, and lessons learned from more advanced sediment-management projects. This support has already helped refine project concepts and improve alignment with broader regional and state efforts. These examples underscore the Committee's core strengths: fostering



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collaboration, improving efficiency, sharing knowledge, and accelerating coastal resilience outcomes. SB 1 funding will build on this foundation. GFA encourages OPC to continue partnering with the Committee as an effective regional model and is prepared to assist with implementation.

For these reasons, **GFA strongly supports Item 6b.** With sea-level rise accelerating and placing coastal ecosystems, cultural resources, and communities at increasing risk, SB 1 funding and statewide coordination are more critical than ever. The proposed investments advance OPC's strategic goal to safeguard California's coast and ocean in the face of climate change.

Thank you for the opportunity to provide public comment on the OPC agenda items. We commend OPC for its commitment to inclusive, science-based coastal and ocean stewardship. GFA is proud to contribute to the success of this work and looks forward to working with OPC in the years ahead. Please feel free to contact me at mkrach@farallones.org with any questions or to further explore opportunities for collaboration.

Sincerely,

Monika Krach
Executive Director
Greater Farallones Association

San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600 fax 888 348 5190

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December 8, 2025

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Sincerely,

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Lawrence J. Goldzband
Executive Director



Comments for the December 9, 2025, [OPC meeting agenda](#):
From Keith Rootsart, Giant Kelp Restoration Project in Monterey

Agenda Item 4. 2026-2030 OPC Strategic Plan

In 2023, Assembly Bill 1407 sought a 5,000 acre target for kelp restoration by 2050. Strategic Plan Objective 3.3.2 establishes a 500 acre target for kelp restoration by 2030; 10% of the 2050 goal. Since the kelp crisis began a decade ago, progress towards this objective has not advanced because kelp restoration is still unfunded and illegal. Let's get started!

Agenda Item 6. Climate Vulnerability of California's Natural Surfing Capital

This is a great study that should be extended to other ocean recreational activities like diving, kayaking, and tourism in Monterey. Kelp restoration is a low-cost nature-based solution to mitigate the effects of sea level rise by reducing beach erosion, making better waves for surf riders, and provides a rich biodiverse habitat for over 800 species that benefit all ocean lovers.

Agenda Item 9. Proposition 4 Emergency Regulations

We advised the Council that the kelp crisis was urgent in 2019. Now the Monterey urchin outbreak has wrecked kelp forests from Monterey to Morro Bay. After a decade of hoping the crisis would cure itself, these regulations are no longer an emergency response, but an expensive recovery. Costs will continue to escalate exponentially the longer it takes to obtain funding and permission. We remain committed to helping our kelp.



Keith Rootsart, 2019 OPC Meeting



Keith Rootsart and friends, 2024 Mermaid Convention

Agenda Item 10. Public Comments on Non-Agenda Items

The 2025 Proposition 68 grant funding for Advancing 30x30 in Coastal Waters accepted 145 Letters of Interest to submit full applications for only a dozen projects. The criteria for acceptance were very broad and not vetted for which projects the State was interested in pursuing; most applicants will be disappointed. Our LOI was accepted and we submitted a full application for consideration.

Thank you.