



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,

A handwritten signature in cursive script that reads "Jenn Eckerle".

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