



California Fish and Game Commission
 715 P Street, 16th floor,
 Sacramento, CA 95814

February 14, 2024

RE: Petition to Modify CA Marine Protected Area Network to Enhance Protections for California’s Most Resilient Kelp Forests

Dear President Sklar and Honorable Commissioners:

Northern California has lost more than 95% of its kelp forests since 2014, and kelp forests statewide have experienced declines over the past decade.¹ California sea otters are still listed as threatened under the Endangered Species Act, and one of the biggest barriers to this species' recovery and range expansion is increased shark bites from a lack of kelp forest cover. Marine heatwaves have doubled over the last 30 years, and have become more intense and longer in duration, putting stress on California's marine species and ecosystems.²

In the face of these mounting threats, California has a unique opportunity to take bold and effective action to conserve ocean habitats and ensure a greater abundance of life off our coast. Over two decades ago, the state passed the groundbreaking Marine Life Protection Act (MLPA), which called on the state to use one of the most powerful tools for ocean conservation: marine protected areas (MPAs).

MPAs, like state parks on land, protect unique and important ocean habitats from activities that can damage ocean life. Areas that are strongly protected have been shown to be highly effective in conserving biodiversity, enhancing ecosystem resilience, and mitigating the impacts of climate change on our oceans.³ By providing areas that serve as buffers against climate change, fully protected MPAs adapt to changing environmental conditions because they better preserve natural interactions within ecosystems, allowing for greater resiliency.⁴

California's network of MPAs, foreseen in the MLPA, celebrated its tenth anniversary last year, and the state's decadal management review showed that MPAs effectively protect ocean habitats and increase fishery-targeted species' biomass. Now, we need to build on this system and maintain California's role as a national and global leader in the fight to protect more ocean habitats.

Protecting specific habitat areas, including the remaining areas of stable kelp forests is a crucial step in safeguarding our diverse marine species and ensuring the long-term well-being of our ocean environments.

We support the expansion of the MPA Network to include some of the most resilient kelp forests along California's coastline, by expanding Cabrillo State Marine Reserve, Point Dume State Marine Conservation Area, South Point State Marine Reserve, Gull Island State Marine Reserve,

¹ Meredith McPherson et. al, [Large-scale shift in the structure of a kelp forest ecosystem co-occurs with an epizootic and marine heatwave](#), Communications Biology, March 5, 2021

² García-Reyes, Marisol, Andrew Leising, Rebecca Asch, Steven Bograd, and Tessa M Hill. Rep. Indicators of Climate Change in California, "[Coastal Ocean Temperature](#)", *California Office of Environmental Health Hazard Assessment*, 2022.

³ Arafah-Dalmau et al., [Integrating climate adaptation and transboundary management: Guidelines for designing climate smart marine protected areas](#), One Earth 6, 1–19 November 17, 2023 ^a 2023 Published by Elsevier Inc.

⁴ Jankowska, Emilia, et al. "[Climate Benefits from Establishing Marine Protected Areas Targeted at Blue Carbon Solutions](#)." *Proceedings of the National Academy of Sciences*, vol. 119, no. 23, 2022.

Point Conception State Marine Reserve, Natural Bridges State Marine Reserve, and by creating a new MPA around the beautiful kelp forest off Pleasure Point near Santa Cruz. While kelp forests have faced declines statewide in recent years, in these areas they have persisted or bounced back quickly in the face of marine heatwaves and other disturbances.⁵ By expanding protections for these resilient forests under the MLPA, the state can minimize direct human impacts in these relatively healthy areas, helping to ensure their continued persistence and enhancing the effectiveness of restoration efforts for declining kelp ecosystems nearby.

Enhancing the protection of California's kelp forests strongly aligns with Goals 1, 2, 3, and 4 of the MLPA by preserving natural diversity, sustaining marine life populations, protecting marine habitats for their intrinsic value, and improving recreational and educational opportunities while minimizing human disturbance.⁶ Safeguarding resilient kelp ecosystems will ensure critical habitat preservation for diverse marine species, including endangered sea otters and commercially valuable fish.

Our ocean is a source of clean air, wildlife, and natural beauty, but also a mystery that beckons preservation and exploration. California has the opportunity to lead the nation and the world in taking bold action to preserve the sea, ensuring its future and the well-being of the communities that rely on it for their survival and prosperity.

Sincerely,

Laura Deehan
State Director
Environment California Research and Policy Center

Tomas Valadez
CA Policy Associate
Azul

Robert Vergara
Roger Arliner Young (RAY) Ocean Conservation Fellow
Natural Resources Defense Council

Clara Castronovo
Board Chair

⁵ California Department of Fish and Wildlife. (2022). California's Marine Protected Area Network Decadal Management Review.

⁶ "Marine Life Protection Act." CDFW. <https://wildlife.ca.gov/Conservation/Marine/MPAs/MLPA>.

CALPIRG Students

Keith Shattenkirk
Program Officer, Healthy Lands and Waters
Patagonia

Susan Jordan
Executive Director
California Coastal Protection Network

Ashley Eagle-Gibbs
Interim Executive Director
Environmental Action Committee of West Marin

Krista Rogers
Program Manager
Save Our Shores

Azsha Hudson
Marine Conservation Analyst
Environmental Defense Center

Chelsea Tu
Executive Director
Monterey Waterkeeper

Angela Kemsley
Conservation Director
WILD Coast

Lance Morgan
President
Marine Conservation Institute

Betsy López-Wagner
Principal
López-Wagner Strategies, an Equitable Communications Agency®

Janet Cox
President

Climate Action CA

Pauline Seales
Organizer
Santa Cruz Climate Action Network

Dan Silver
Executive Director
Endangered Habitats League

Josefina Barrantes
30x30 Coordinator
Environmental Protection Information Center (EPIC)

Martha Camacho Rodríguez
Director
SEE (Social Eco Education)

Megan Shumway
Member
CHN, Sacramento Climate Coalition, SacAct

Antonina Markoff
Coordinator
The Climate Reality Project California State Coalition

Robert Gould, MD
President
San Francisco Bay Physicians for Social Responsibility

Esperanza Vielma
Executive Director
Environmental Coalition for Water Justice

Daniel Chandler
Steering Committee Member
350 Humboldt

Andria Ventura
Legislative and Policy Director

Clean Water Action/Clean Water Fund

Daniel Gluesenkamp
Executive Director
California Institute for Biodiversity

Elizabeth Dougherty
Executive Director
Wholly H2O

Baani Behniwal
Natural Sequestration Initiative Manager
The Climate Center

Jim Lindburg
Legislative Consultant
Friends Committee on Legislation of California

Scott Black
Executive Director
Xerces Society for Invertebrate Conservation

Suzanne Hume
Educational Director and Founder\
CleanEarth4Kids.org

Matt Baker
Policy Director
Planning and Conservation League