

CALIFORNIA FISHERMEN'S RESILIENCY ASSOCIATION

1118 6th St.
Eureka, CA 95501

California Fish and Game Commission

715 P Street

Sacramento, CA 95814

Electronic Submission

April 11, 2026

Re: MPA Petitions – Request for Denial

President Sklar and Commissioners,

In January 2022, California port-based commercial fishermen's associations formed the California Fishermen's Resiliency Association (CFRA), a California Nonprofit Mutual Benefit Corporation. CFRA membership extends from Crescent City to San Diego, California, and includes seventeen separate fishermen's organizations (as of July 2025). CFRA represents its members' interests and provides support at the local, state, and federal levels on issues including spatial challenges to fishing ground access, non-fishing ocean industrialization, ecological and environmental concerns, marine zoning, port infrastructure, and impact mitigation. CFRA represents all fisheries and gear types through its member associations.

CFRA receives funding from the California Ocean Protection Council.

We appreciate the opportunity to provide comments to the Commission and value the role of public input in informing balanced and effective marine resource management.

We are writing in support of the California Department of Fish and Wildlife staff recommendation to deny all Bin 2 MPA petitions. CFRA recognizes and appreciates CDFW's

science-based approach to evaluating MPAs, particularly in light of the State's recent completion of the first decadal review of the existing MPA network. This comprehensive review represents a significant investment of time, data collection, and analysis, and provides an appropriate and rigorous foundation for assessing MPA performance and guiding future decisions.

Our support for the CDFW staff's denial recommendation is based on research conducted by the University of Washington (sustainablefisheries-uw.org), which states that MPAs have no positive effect on threats to marine life posed by ocean acidification, global warming, coastal development, terrestrial and urban runoff, and human pollution of the global environment. "Recent reviews of the extensive MPA network in California have concluded there is no evidence for a regional increase in biodiversity or targeted fish abundance, nor is there evidence for MPAs providing climate resiliency." We believe this underscores the need to limit further MPA expansion and to continue supporting CDFW's scientific evaluation of the existing MPA network throughout California's productive and extensively managed fishing grounds.

Additionally, continued expansion of California's MPAs negatively impacts local fishing communities through the loss of traditional small-scale fishing grounds, while also depriving Californians of locally sourced, low-carbon-footprint seafood.

The California Department of Fish and Wildlife has a strong history of sound scientific research and policy for the management and protection of California's ocean resources. We respectfully urge the Commission to follow their recommendation and deny MPA petitions that lack clear, evidence-based scientific justification.

We thank you and greatly appreciate the work that you do.

Ken Bates and Linda Hildebrand, Executive Directors

California Fishermen's Resiliency Association