October 7, 2026

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Re: 2023 Marine Protected Area Bin 2 Petitions

Dear President Sklar and Members of the Commission:

The Congressional Sportsmen's Foundation (CSF) respectfully urges the Commission to accept the California Department of Fish and Wildlife's (Department) petition-specific recommendations for the Marine Protected Area (MPA) Bin 2 petitions, including its recommended denials of proposals to establish new or expand MPAs that would further restrict fishing without any specific scientific basis. We appreciate the Department's use of a consistent evaluation framework to assess the proposed changes and believe its recommendations provide an appropriate foundation on which to base the Commission's decisions.

CSF works with federal and state policymakers to advance policies that conserve fish and wildlife while protecting opportunities for hunting, fishing, and other outdoor recreation. Healthy marine ecosystems and sustainable fisheries are essential to recreational fishing. Conserving those resources and maintaining public access are mutually reinforcing objectives that should guide California's marine management decisions.

We commend the Department for evaluating the petitions against a framework that considers the Marine Life Protection Act's goals, the MPA Master Plan, and the Decadal Management Review. The framework also asks whether proposals address management challenges, whether significant information gaps exist, and whether new information warrants reconsidering changes previously evaluated during network design. Its consideration of feasibility, enforceability, equitable access, and coastal fishing communities helps ensure that proposed changes are assessed in their full management context.

Adaptive management should connect an identified conservation need to an action capable of addressing that need, then measure the results. The Commission should give substantial weight to the Department's technical evaluations and recommendations developed through that process. If the Commission departs from a recommended denial, it should explain the evidence supporting that departure, the specific benefit expected from the proposed restriction, and how that benefit will be evaluated.

CSF is particularly concerned about additional fishing closures justified primarily by a generalized precautionary approach. Marine reserves eliminate recreational fishing within their boundaries, and other MPA designations can substantially limit angling opportunities. Those access losses are immediate, while the incremental benefits of a proposed closure may remain uncertain. The assumption that additional protection

could provide benefits should not be the basis for excluding recreational anglers when a specific conservation concern has not been identified.

The evaluation framework's attention to equitable access and coastal fishing communities is especially important. Closing an accessible stretch of coast can impose disproportionate burdens on shore-based anglers, families fishing for food, and small-boat anglers with limited range. Traveling farther can increase costs and reduce opportunities for people who cannot readily reach alternative fishing grounds. Consideration of any additional fishing restrictions should require a meaningful assessment of these consequences, including cumulative effects alongside existing closures, and engage the communities that would bear them.

We also support meaningful Tribal consultation, cultural fishing opportunities, and Tribal participation in marine stewardship. The Commission should pursue these objectives through collaborative, petition-specific solutions and evaluate any accompanying recreational fishing restrictions on their own conservation merits.

California can better achieve conservation outcomes through habitat restoration, water quality improvements, sustainable fisheries management, and continued monitoring of MPA performance. That monitoring should guide future adjustments using measurable objectives and evidence of management need.

CSF respectfully requests that the Commission adopt the Department's petition-specific recommendations and continue to apply a transparent, science-based process that accounts for conservation outcomes and public access. We look forward to working with the Commission, Department, and the recreational fishing community to sustain healthy marine resources and meaningful angling opportunities.

Sincerely,



Chris Horton
Senior Director of Fisheries Policy
Congressional Sportsmen's Foundation