

Memorandum



Date: November 30, 2009

To: John Carlson, Jr.
Executive Director
Fish and Game Commission

From: **John McCamman, Acting Director**
Department of Fish and Game

Subject: Submission of Department of Fish and Game Feasibility Evaluation of the Marine Life Protection Act Blue Ribbon Task Force Integrated Preferred Alternative for Marine Protected Areas in the Marine Life Protection Act South Coast Study Region

The Department of Fish and Game (Department) has reviewed the Marine Life Protection Act (MLPA) Blue Ribbon Task Force (BRTF) recommendation for a preferred alternative for Marine Protected Areas (MPAs) in the MLPA South Coast Study Region. The BRTF adopted their preferred alternative, known as the Integrated Preferred Alternative (IPA), at their November 10, 2009 meeting in Los Angeles. The evaluation and comments contained in this memo and attached evaluation focus on feasibility aspects of individual MPAs and on their prospects of achieving the MLPA goals. The attached evaluations provide specific comments and recommendations regarding the feasibility of the IPA.

If you have further questions or need additional information, please contact Ms. Becky Ota, Habitat Conservation Program Manager, Marine Region, at (650) 631-6789.

Attachment(s)

Author: SA, BTO

cc: Ms. Marija Vojkovich
Department of Fish and Game
Santa Barbara, California

File: D, DD-Sonke Mastrup, B. Ota, S. Ashcraft

California Department of Fish and Game
Feasibility Analysis for the
Blue Ribbon Task Force Integrated Preferred Alternative
November 30, 2009

The Department of Fish and Game (Department) completed an evaluation of the Marine Life Protection Act (MLPA) Blue Ribbon Task Force (BRTF) recommended integrated preferred alternative (IPA) for marine protected areas (MPAs) in the South Coast Study Region (SCSR), which they selected at their November 10, 2009 meeting. As outlined in the California MLPA Initiative Memorandum of Understanding (MOU), the Department may provide information, analysis and comments to the California Fish and Game Commission (Commission) regarding feasibility aspects of proposed MPAs and on prospects of MPA proposals to achieve the goals of the MLPA. The comments included below are intended to fulfill that duty.

This evaluation focuses on the Department's analysis of the feasibility of MPAs in the IPA. The evaluation builds on the feasibility guidelines for MPA designs that are enforceable and easily understood by the public, as outlined in Department memos provided in the SCSR^{1,2} and summarized in a document for the South Coast Regional Stakeholder Group (SCRSG)³. A feasibility evaluation of the three final SCRSG proposals was also previously conducted⁴ and provided to the BRTF and has been forwarded by staff to the Commission.

Improvements to feasibility in IPA:

The final SCRSG proposals 1, 2, and 3 include several feasibility concerns identified by the Department⁴. While the BRTF did not make revisions to the SCRSG proposals, the BRTF did address many of the feasibility issues identified by the Department when creating the IPA. Concerns addressed by the BRTF in the IPA include:

- Simplified regulations for MPAs with complex take allowances;
- Adjusted select shoreline boundaries to align with definable landmarks; and
- Removed unrealistic goals from the IPA and SCRSG proposals, as recommended by the Department, based on MLPA Science Advisory Team (SAT) and Department evaluations of MPA design.

¹ Department of Fish and Game memo. *Statement of feasibility criteria for use in analyzing siting alternatives during the second phase of the Marine Life Protection Act Initiative*. June 11, 2007.

² Department of Fish and Game memo. *Department of Fish and Game update of feasibility criteria for use in analyzing siting alternatives during the second phase of the Marine Life Protection Act*. February 11, 2008.

³ Department of Fish and Game document. *Feasibility criteria and evaluation components for marine protected area proposals*. November 12, 2008.

⁴ Department of Fish and Game document. *Evaluation and Comments on Final Stakeholder Proposals for Marine Protected Areas in the Marine Life Protection Act South Coast Study Region for Blue Ribbon Task Force Consideration*. October 19, 2009.

Remaining feasibility concerns in IPA:

While many feasibility concerns were resolved in the IPA, some concerns do remain for some individual MPAs. The design elements found in the IPA that would decrease MPA feasibility include:

- MPA boundaries that are unclear or difficult to enforce in some areas;
- Intertidal MPAs;
- MPAs with lower SAT level of protection rating, with highly permissive take regulations that allow most take to occur.

▪ MPA boundaries that are unclear or difficult to enforce:

There are boundary concerns for MPAs in three geographies that may lead to public confusion, increase enforcement burden, and reduce enforcement effectiveness.

- At Arrow Point to Lions Head SMCA, distance offshore is used to define the seaward boundary. The Department recommends that a straight line that approximates the distance offshore be used, with coordinates defined at each end of the line.
- A shoreline boundary of Swami's SMCA and of South La Jolla SMR/SMCA bisect a beach. The Department recommends that the boundaries be adjusted to a permanent and visible landmark.
- The northern shoreline boundary of South La Jolla SMR/SMCA bisects an intertidal rock ledge frequented for recreational invertebrate harvest. The Department recommends that the boundary be adjusted to encompass the full ledge.

▪ Intertidal MPAs:

There are three MPAs in the IPA that cover intertidal areas only: Crystal Cove SMCA, Dana Point SMCA, and Arrow Point to Lions Head SMCA. Department enforcement have identified that intertidal MPAs are difficult to enforce. While some localized goals may be met through use of intertidal MPAs, the Department continues to recommend that proposed intertidal MPAs be extended into deeper water to meet localized goals while also contributing to network connectivity, as recommended by the SAT.

▪ MPAs with highly permissive take and lower ecological protection value:

Several proposed MPAs allow certain fishing activities that lower the level of protection (as identified by the SAT) for that MPA, which may compromise its ability to achieve certain goals of the MLPA. In particular, those with a SAT level of protection below moderate-high are unlikely to contribute significantly to accomplishment of MLPA ecological or network goals. The Department has an interest in MPAs that individually provide a high return for their cost in managing, enforcing, and monitoring and are in the spirit of MLPA protection, and recommends that the level of protection be increased (through changing the allowed take).

That being said, there are other goals identified in the MLPA in addition to ecological protection goals. One goal of the MLPA is to improve educational, research, and recreational opportunities provided by areas subject to minimal human disturbance, and

another goal highlights protection of natural heritage sites. Educational or research opportunities or natural heritage are highlighted as primary goals in most of the nine MPAs with a LOP below moderate-high. In these cases, the Department recommended that the stated goals and objectives reflect the primary purpose for increasing educational or research opportunities, or including natural heritage sites, and not ascribe ecological goals that cannot be also met unless the level of protection is increased.

▪ **A note on MPA size**

The Master Plan for MPAs includes SAT-identified criteria for minimum MPA size, that the SAT considers to be the minimum necessary to contribute to MPA biodiversity, or ecological and network goals. The size and level of protection of an MPA both contribute to its prospects of meeting MLPA goals for protection of biodiversity and functioning as a network.

Feasibility Evaluation:

Following is a table that summarizes feasibility concerns with the IPA (Table 1). This table includes Department comments for those MPAs where feasibility concerns exist. This evaluation does not include the Northern Channel Islands and Santa Barbara Island MPAs, as the Fish and Game Commission has previously adopted a motion to not consider changes in these MPAs. Pending military closures proposed by the Department of Defense were also not included in this evaluation. Only areas with MPA designations were evaluated.

Table 1. List of marine protected areas (MPAs) in the South Coast Blue Ribbon Task Force recommendation for an Integrated Preferred Alternative, adopted at their November 10, 2009 meeting, with MLPA Science Advisory Team (SAT) level of protection rating and size category, along with Department of Fish and Game (Department) comments regarding feasibility concerns and recommendations. MPAs are listed from north to south mainland, and the islands (Note: The “Department Comments” column is left blank for MPAs that meet guidelines).

| MPA | SAT Level of Protection ¹ | SAT Size Category ² | Department Comments |
|------------------------|--------------------------------------|--------------------------------|--|
| Pt Conception SMR | Very High | Preferred | |
| Kashayit SMP | Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and outreach opportunities. |
| Naples SMCA | Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and research opportunities. |
| Campus Point SMR | Very High | Minimum | |
| Goleta Slough SMR | Very High | N/A | |
| Point Dume SMCA | High | Preferred (in cluster) | |
| Point Dume SMR | Very High | Preferred (in cluster) | |
| Point Vicente SMR | Very High | Preferred (in cluster) | |
| Abalone Cove SMCA | High | Preferred (in cluster) | |
| Bolsa Chica SMCA | Moderate Low | N/A | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objective is to include entire estuary in an MPA designation while allowing fishing in a select area. |
| Bolsa Chica SMR | Very High | N/A | |
| Upper Newport Bay SMCA | Moderate Low | N/A | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and outreach opportunities. |
| Crystal Cove SMCA | Moderate Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and outreach opportunities. Intertidal MPAs are difficult to enforce³. <i>Recommend extending to deeper water.</i> Boundary concern: Southern boundary utilizes an offshore diagonal line that is not located at a whole minute of latitude and longitude as per the feasibility guidelines. |
| Laguna SMR | Very High | Minimum | |

| | | | |
|--------------------------------|----------------|----------------------------|---|
| Dana Point SMCA | Moderate Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and outreach opportunities. Intertidal MPAs are difficult to enforce³. <i>Recommend extending to deeper water.</i> |
| Batiquitos Lagoon SMR | Very High | N/A | |
| Swami's SMCA | High | Minimum | <ul style="list-style-type: none"> Southern boundary splits a beach. <i>Recommend moving boundary to permanent and readily visible landmark.</i> |
| San Elijo Lagoon SMR | Very High | N/A | |
| San Diego Scripps Coastal SMCA | Moderate Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objectives are education and research opportunities near a key research institution. |
| Matlahuayl SMR | Very High | Below minimum | <ul style="list-style-type: none"> While does not meet SAT size guideline, primary objectives are education and research opportunities near a key research institution. |
| South La Jolla SMR/SMCA | Very High/High | Below minimum (in cluster) | <ul style="list-style-type: none"> While does not meet SAT size guideline, provides for education and research opportunities near a key research institution. Northern boundary divides an intertidal rock ledge popular for mussel and invertebrate harvest, that would be difficult to enforce. <i>Recommend moving north boundary northward to enclose entire ledge.</i> Southern boundary intersects a beach. <i>Recommend moving southern boundary to permanent and readily visible landmark.</i> |
| Famosa Slough SMR | Very High | N/A | |
| Cabrillo SMR | Very High | Below minimum | <ul style="list-style-type: none"> While does not meet SAT size guideline, primary objectives are education and outreach opportunities adjacent to a national monument. |
| Tijuana River Mouth SMCA | High | Below minimum | <ul style="list-style-type: none"> While does not meet SAT size guideline, primary objectives are education and research opportunities at the mouth of a national estuarine research reserve. |
| Lions Head to Arrow Point SMCA | Low | Below minimum | <ul style="list-style-type: none"> While does not meet SAT guidelines, primary objective is to maintain long-standing intertidal invertebrate protection. Utilizes boundaries that do not meet feasibility guidelines (distance offshore). <i>Recommend defining boundary using straight lines that approximate distance offshore, with coordinates defined at each end of the line.</i> Intertidal MPAs are difficult to enforce³. <i>Recommend extending to deeper water.</i> |
| Bird Rock SMCA | High | Minimum (in cluster) | |
| Blue Cavern SMR | Very High | Minimum (in cluster) | |
| Long Point SMR | Very High | Below minimum | <ul style="list-style-type: none"> While does not meet SAT size guideline, primary objectives are education and research opportunities. |

| | | | |
|--------------------------|---------------|----------------------|--|
| Casino Point SMR | Very High | Below minimum | ▪ While does not meet SAT size guideline, primary objectives are education and recreation opportunities. |
| Lovers Cove SMCA | Moderate High | Below minimum | ▪ While does not meet SAT size guideline, primary objectives are education and recreation opportunities. |
| Farnsworth Onshore SMCA | High | Minimum (in cluster) | |
| Farnsworth Offshore SMCA | High | Minimum (in cluster) | |
| Cat Harbor SMCA | Moderate Low | Below minimum | ▪ While does not meet SAT guidelines, primary objective is to protect squid from harvest in a key spawning ground. |
| Begg Rock SMR | Very High | Preferred | |

- 1 – MPAs with a SAT level of protection below moderate-high are unlikely to achieve broader ecological benefits or contribute to accomplishment of MLPA biodiversity or network goals. The Department has an interest in MPAs that individually provide a high return for their cost in managing, enforcing, and monitoring.
- 2 – SAT minimum and preferred size guidelines from MLPA Science Advisory Team and incorporated Master Plan for MPAs. Size guidelines do not apply to estuaries.
- 3 – The Department and SAT continues to recommend that proposed intertidal MPAs be extended into deeper water to meet localized goals and also contribute to broader ecological goals and network connectivity.

State of California
M e m o r a n d u m



Date: October 19, 2009

To: MLPA Blue Ribbon Task Force

From: 
Donald Koch, Director
Department of Fish and Game

Subject: Evaluation and Comments on Final Stakeholder Proposals for Marine Protected Areas in the Marine Life Protection Act South Coast Study Region for Blue Ribbon Task Force Consideration

The Department of Fish and Game (Department) has reviewed the final round of stakeholder proposals for Marine Protected Areas (MPAs) provided to the Blue Ribbon Task Force (BRTF) for the South Coast Study Region (SCSR) Initiative planning process. The evaluation and comments contained in this memo and attached evaluations focus on feasibility aspects of individual MPAs by proposal, and on their prospects of achieving the MLPA goals. The attached evaluations provide specific comments and recommendations regarding the feasibility each proposal.

The Department appreciates this opportunity to provide input to the BRTF. We hope this input will assist the BRTF in its deliberations and in determining a preferred alternative to recommend to the Fish and Game Commission. If you have additional questions regarding the Department's input, please contact Ms. Becky Ota, Habitat Conservation Program Manager, Marine Region, at (650) 631-6789 or by e-mail at bota@dfg.ca.gov.

Attachments

cc: Secretary Mike Chrisman, Natural Resources Agency
President Jim Kellogg, Fish and Game Commission
Executive Director John Carlson, Fish and Game Commission
Becky Ota, Department of Fish and Game
MLPA South Coast Regional Stakeholder Group
MLPA Initiative staff
MLPA Master Plan Science Advisory Team
MLPA Statewide Interests Group

**California Department of Fish and Game Feasibility Analysis of
Final Stakeholder Marine Protected Area Proposals
October 14, 2009**

The Department of Fish and Game has completed an evaluation of final marine protected area (MPA) proposals developed by the South Coast Regional Stakeholder Group (SCRSG) for submission to the Blue Ribbon Task Force (BRTF). The Department's feasibility concerns, and options for how to address them, are provided in this document.

Throughout the south coast planning process, the Department has provided support to the SCRSG and BRTF regarding feasibility aspects for siting MPA proposals. A document outlining the feasibility guidelines used for the evaluation was previously provided to the SCRSG and BRTF¹ and was used to evaluate draft proposals submitted in all rounds of the SCRSG planning process. This will also be used ultimately as the basis for developing advice for the California Fish and Game Commission regarding south coast MPA proposals. Follow-up memos² were also provided to clarify issues that emerged during the south coast planning process. The Department also prepared an evaluation of existing MPAs in early 2009, and draft MPA proposals in April and August 2009. These were provided to stakeholders to offer examples of feasibility issues the Department will comment on, and to guide stakeholders in crafting MPA designs that are most likely to be effective and meet the goals of the MLPA. Department staff provided support and feedback to stakeholders and SCRSG workgroups throughout the planning process in work sessions, by email, and by phone.

The Department notes that final proposals have addressed many of the feasibility issues frequently observed in the first two rounds of proposal development. For example, most of the proposed MPAs have clearly stated goals and objectives and rationale, and clear and simple boundaries. On several occasions the Department recommends the removal of MPAs that are below size guidelines; however there is an alternative action. In these areas where MPA are below size guidelines but larger amounts of habitats are available for inclusion within an MPA, an opportunity exists for improving the overall network strength and connectivity by increasing the size of the MPA to meet size guidelines. Other general feasibility concerns also remain in the final proposals that the Department recommends be addressed. The feasibility rating of +/- only accounts for boundaries or regulations and not MPA size or other design criteria. The most frequent design elements that would decrease MPA feasibility include:

- Unclear or difficult to enforce boundaries in some areas;
- Allowed take regulations with multiple take allowances that are too complex or confusing; and
- MPA designations that are inappropriate for existing and continuing uses of the area.

¹ "Feasibility Criteria and Evaluation Components for Marine Protected Area Proposals" (CDFG memo; November 12, 2008).

² "Law Enforcement Division Guidance on Catch and Release Fishing in MPAs" (CDFG Memo; January 7, 2009); and " Law Enforcement Division Guidance on Bag Limits and Size Limits in MPAs" (CDFG Memo; February 10, 2009).

Tables 1 through 3 below summarize Department feasibility concerns for proposed MPAs within Proposal 1, Proposal 2, and Proposal 3, respectively. A more detailed analysis of concerns and, in some cases, recommendations for options to alleviate or eliminate the stated concerns follows each table.

Table 1. Summary of Department of Fish and Game feasibility concerns by MPA in SCRSG Final MPA Proposal 1. Proposed MPAs that are not recommended by the Department for implementation are indicated by **bold type** and an asterisk (*). Options to remedy MPAs that do not meet Department guidelines are provided in the text below the table.

Note: Feasibility ratings include "+" (meets all Department guidelines) or "-" (does not meet all Department guidelines).
 LOP= Level of Protection, VH=Very High, H=High, MH=Moderate High, M=Moderate, ML=Moderate-Low, L=Low.

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|-----------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Point Conception SMR | VH | Preferred | + | | | No Action Recommended | |
| Kashtayit SMP* | L | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish, most invertebrates and giant kelp). • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>MPA Name</u>: The Department recommends that a geographic-based name be added (hyphenated to tribal name). • <u>Note</u>: Includes recommendation for a formal partnership between the Department and an identified tribe. The Department notes that an MOU could be explored if the MPA is adopted. Also, this proposed SMP requires input from a State Parks feasibility perspective. • <u>Action</u>: See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|----------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Naples SMCA* | L | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (allows take of all finfish by spear and giant kelp) • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Note</u>: Includes recommendation for a formal partnership between the Department and an identified tribe. The Department notes that an MOU could be explored if the MPA is adopted. • <u>Action</u>: See General Comments below. |
| Helo SMR | VH | Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> • <u>MPA Name</u>: The Department recommends that a geographic-based name be added (hyphenated after tribal name). |
| Devereux Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| Goleta Slough SMR | VH | N/A | + | | | No Action Recommended | |
| Carpinteria Salt Marsh SMR | VH | N/A | + | | | No Action Recommended | |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|------------------|-----|--|-----------------------------|------------------|-------------|---|--|
| | | | | Boundaries | Regulations | | |
| Point Dume SMCA | H | Minimum (Preferred cluster with Point Dume SMR) | + | | | No Action Recommended | <ul style="list-style-type: none"> <u>Note:</u> Includes recommendation for a formal partnership between the Department and an identified tribe. The Department notes that an MOU could be explored if the MPA is adopted. |
| Point Dume SMR | VH | Below Minimum (Preferred cluster with Point Dume SMCA) | + | | | No Action Recommended Assuming it is Clustered with Point Dume SMCA | <ul style="list-style-type: none"> <u>Note:</u> Receiving a + score for this MPA is dependent on linking, or clustering, with Point Dume SMCA. This MPA also includes a recommendation for a formal partnership between the Department and an identified tribe. The Department notes that an MOU could be explored if the MPA is adopted. |
| Palos Verdes SMR | VH | Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> <u>Boundaries:</u> Boundaries meet boundary guidelines. However, the boundaries create a complex design that leaves an "open" area inshore of the SMR. The Law Enforcement Division finds the shape of the Palos Verdes SMR to be complex for public understanding and may trouble the courts in appropriate adjudications. <u>Action:</u> The Law Enforcement Division recommends that a different shape be chosen for Palos Verdes SMR. Also, See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|--------------------|-----|---------------|-----------------------------|------------------|-------------|----------------------|--|
| | | | | Boundaries | Regulations | | |
| Point Fermin SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish and some invertebrates). Also, take regulations are more permissive than the current MPA. • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Bolsa Chica SMCA | MH | N/A | - | | | Modify MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: This MPA is proposed to allow catch and release shore fishing using hook and line gear. The area is a contained water body that may be enforceable. However, the Law Enforcement Division has received comments from several field Wardens stating that this area is a highly utilized take (or subsistence) fishery with very little catch and release fishing occurring. With a catch and release only MPA, it would take a huge enforcement effort causing Wardens to respond frequently, generate frequent citations, and would burden the courts in a way that may hinder the appropriate adjudications. • <u>Action</u>: Recommend that catch and release be changed to either a fully no-take or take area. |
| Upper Newport Bay SMCA | MH | N/A | + | | | No Action Recommended | <ul style="list-style-type: none"> • <u>Take Regulations</u>: This MPA is proposed to allow catch and release shore fishing using hook and line gear. The area is a contained water body with easily recognized landmarks that should help with the overall enforcement of the catch and release area. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|-----------------------|-----|---------------|-----------------------------|------------------|-------------|----------------------|---|
| | | | | Boundaries | Regulations | | |
| Crystal Cove SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically and results in complex regulations due to the extensive allowed take (MPA allows take of all finfish, except sheephead, and some invertebrates). • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs poses confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Note</u>: Includes recommendation for a formal partnership between the Department and an identified tribe. The Department notes that an MOU could be explored if the MPA is adopted. • <u>Action</u>: See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|------------|-----|---------------|-----------------------------|------------------|-------------|--------------------|--|
| | | | | Boundaries | Regulations | | |
| Laguna SMR | VH | Minimum | + | | | Modify MPA | <ul style="list-style-type: none"> • <u>MPA Design</u>: Technically meets Department guidelines for boundaries. However, the Law Enforcement Division (LED) finds this shape to be complex for public understanding offshore, and may trouble the courts in appropriate adjudications. Thus, LED recommends that an alternate shape be identified for this site. • This MPA proposes a requirement for scientific collection by fishermen trained to collect data. The Department wants to make sure the data collection recommendations are not identified as a regulatory requirement. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|-------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Dana Point SMCA* | ML | Below Minimum | - | X | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: South-eastern boundary does not meet feasibility guidelines for the use of diagonal lines. • <u>Take Regulations</u>: Provides little protection ecologically and results in complex regulations due to the extensive allowed take (MPA allows take of all finfish, except sheephead, and some invertebrates). • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs pose confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Batiquitos Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| San Elijo Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| Del Mar SMR | VH | Minimum | + | | | No Action Recommended | |
| San Dieguito Lagoon SMR | VH | N/A | + | | | No Action Recommended | |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|---------------------------|-----|---------------|-----------------------------|------------------|-------------|---|--|
| | | | | Boundaries | Regulations | | |
| Los Penasquitos Marsh SMR | VH | N/A | + | | | No Action Recommended | |
| La Jolla Cove SMR | VH | Below Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> Boundaries: Boundaries do not meet feasibility guidelines. While there are current boundary markers, using a buoy is not recommended by the Law Enforcement Division due to the unpredictability of storms and heavy seas. Once a buoy has moved or been terminated, there will be no recognizable boundary marker, thus defeating the purpose of the SMR. Also, replacement of buoys may take days to weeks. While the boundary markers are maintained by local governments, these are subject to budgetary cuts. For this reason, enforcement does not recommend this type of management system. In lieu of this approach, The Law Enforcement Division recommends using recognizable land marks. MPA Design: Does not meet SAT minimum size guidelines. Action: Adjust outer western boundary to meet feasibility guidelines. |
| La Jolla South SMR | VH | Below Minimum | + | | | No Action Necessary but Changes Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet minimum size guidelines. Recommend increasing MPAs to meet size guidelines or remove MPA Note: Meets Department design criteria |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|-----------------------|-----|--|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| La Jolla South SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Complex regulation with a long list of excepted species and gear types to the general regulations makes it difficult to understand and enforce the regulation (MPA allows 4 different gear types and a long list of excepted species). • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Other Regulated Activities</u>: This MPA identifies a data collection program using commercial fishermen certified in data collection. The Department wants to make sure the data collection recommendations are not identified as a regulatory requirement. • <u>Action</u>: See General Comments below. |
| Famosa Slough SMR | VH | N/A | + | | | No Action Recommended | |
| Ocean Beach Pier SMCA | MH | Below Minimum (Minimum cluster with Ocean Beach SMR) | - | X | | Modify MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Northern boundary splits a beach. The Department recommends moving the northern boundary north to 32°45.100, to increase public understanding and enforceability of the boundaries in this heavy shore-based user area. Also, the offshore diagonal line does not meet feasibility guidelines for diagonal lines. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|--------------------------|-----|---------------|-----------------------------|------------------|-------------|----------------------|--|
| | | | | Boundaries | Regulations | | |
| Ocean Beach SMR | VH | Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> <u>Boundaries</u>: The eastern portion of the northern boundary creates a diagonal line that does not meet feasibility guidelines. |
| Cabrillo SMR | VH | Below Minimum | + | | | | <ul style="list-style-type: none"> <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Tijuana River Mouth SMCA | MH | Below Minimum | - | X | X | Modify MPA | <ul style="list-style-type: none"> <u>MPA Design</u>: Does not meet SAT minimum size guidelines. <u>Boundaries</u>: Boundaries meet guidelines. However, enforceability could be improved by extending the southern boundary to the U.S./Mexico border. <u>Take Regulations</u>: Specifies that pier fishing is allowed in an area where no pier exists. <u>Action</u>: The Department recommends removing pier fishing as an allowed take and moving the southern boundary to the U.S./Mexico border. |
| Emerald Bay SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish). <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. This MPA also does not meet SAT minimum size guidelines. <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. <u>Action</u>: See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Blue Cavern SMR | VH | Minimum | + | | | No Action Recommended | |
| Cat Harbor SMCA* | L | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish, some invertebrates and mariculture). • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Long Point SMR | VH | Below Minimum | + | | | | <ul style="list-style-type: none"> • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Farnsworth SMCA* | H | Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: A long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 5 different gear types and a long list of excepted species). • <u>Action</u>: See General Comments below. |

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Action | DFG Comments and Concerns |
|--------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Casino Point SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Regulations include the take of urchin under special permit. Management schemes, such as is proposed here, constitute fisheries management and are not in the purview of the MLPA. Recreational take of urchin should be permitted without the use of a special permit. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. The Department does not support the use of intertidal MPAs. • <u>Action</u>: Remove requirement for special permit and improve level of protection. • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Lover's Cove SMCA | MH | Below Minimum | + | | | No Action Recommended | |
| Begg Rock SMR | VH | Preferred | + | | | No Action Recommended | |

GENERAL COMMENTS on Final SCRSG MPA Proposal #1

Enforcement partners: In some instances, where proposed MPAs do not meet Department guidelines (e.g., irregular diagonal lines, multiple zoning, complex regulations), local enforcement or outreach partners have offered to provide local efforts to counter-balance Department concerns over infeasible boundaries or regulations. This has been reflected where State Park officers or local city marine enforcement are present, or where boundary markers are maintained by local governments. In these cases, partnership efforts are subject to budgetary cuts. In addition, the Department's Law Enforcement Division is the primary law enforcement agency responsible for patrolling and enforcing laws in Marine Protected Areas. Other agencies are subjected to their primary responsibilities, which may neglect the appropriate effort

required for marine enforcement. Also, other agencies may not be fully equipped to provide adequate patrol such as boats, airplanes and special operations. Therefore, while the Department appreciates law enforcement partners, it cannot recognize these as "surrogates" for Department enforcement responsibilities in these instances, and the Department evaluation will apply standard feasibility criteria.

Tribal Partnership MPAs: Several MPAs in Proposal 1 include recommendations to establish a formal partnership between various tribes and the Department. These include: Kashtayit SMP, Naples SMCA, Point Dume SMCA and Point Dume SMR, Bolsa Chica SMCA, Crystal Cove SMCA, and Batiqitos SMCA. The Department notes that the appropriate time to consider a partnership would be through a Memorandum of Understanding (MOU) if any of these MPAs were adopted by the Fish and Game Commission. Also, any desired protections for cultural preservation should be directed to the Park and Recreation Commission.

OPTIONS TO REMEDY- Final SCRSG MPA Proposal #1

Options to improve proposed MPAs that received a negative rating ("–") in the table above are provided below.

Kashtayit SMP

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of finfish, marine invertebrates except rock scallops and mussels, and giant kelp by hand harvest). As proposed, this MPA has a low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take, and improve the level of protection for the MPA; or
 2. Eliminate Kashtayit SMP from the proposal and recommend to the California Park and Recreation Commission for designation to meet cultural goals.

Naples SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of finfish by spear and giant kelp by hand harvest). As proposed, this MPA has a low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:

1. Regulations: Reduce the number of gear types and species allowed for take, and improve the level of protection for the MPA; or
2. Eliminate Naples SMCA from the proposal.

Palos Verdes SMR

Concerns: While the boundaries technically meet Department guidelines, Department Enforcement has expressed specific concerns regarding the complexity of the boundaries resulting from the shape of the coastline. The boundaries create a complex design that leaves an "open" area inshore of the SMR, which will interfere with public understanding and enforceability of the regulation.

- Options to Remedy:
 1. Boundaries: MPA would need to be redesigned to eliminate the "open" portion of the area between the MPA and land to alleviate enforcement concerns; or
 2. Replace with alternative shape from Proposal 2 or 3 that extends from mean high tide out to the limit of state waters.

Point Fermin SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of finfish, shore fishing, and diving for lobsters, and allows the commercial take of urchin and lobster). As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations and MPA Design: Reduce the number of gear types and species allowed for take, improve the level of protection for the MPA, and extend MPA into deeper waters; or
 2. Eliminate Point Fermin SMCA from the proposal.

Crystal Cove SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of most finfish, urchin, and lobster, and allows the commercial take of lobster, urchin, and market squid). Regulations are also complex as they allow five gear types/methods, and allows the take of finfish by spear and hook and line with the exception of one species (sheephead). As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility

guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations and MPA Design: Reduce the number of gear types and species allowed for take, improve the level of protection for the MPA, and extend MPA into deeper waters; or
 2. Eliminate Crystal Cove SMCA from the proposal.

Dana Point SMCA

The proposed regulations provide little protection ecologically (MPA allows recreational take of most finfish, urchin, and lobster, and allows the commercial take of lobster, urchin, and market squid). Regulations are also complex as they allow 5 gear types/methods, and MPA allows the take of finfish by spear and hook and line with the exception of one species, sheephead. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations and Boundaries: Reduce the number of gear types and species allowed for take, improve the level of protection for the MPA, and extend MPA into deeper waters; or
 2. Eliminate Dana Point SMCA from the proposal.

La Jolla South SMCA

Concerns: A long list of excepted species and gear types to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 4 different gear types/modes and a long list of excepted species). Complex regulations such as this decrease enforceability and public understanding of the regulation. A management scheme, requiring commercial fishermen to collect data and gain certification to fish in the area, is also proposed for this MPA. Management schemes, such as the one proposed here constitutes fisheries management and is not in the purview of the MLPA.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take, improve the level of protection for the MPA, and move the language requiring commercial fishermen to collect data and gain certification to fish in the area from regulations to a recommendation; or

2. Eliminate La Jolla South SMCA from the proposal.

Emerald Bay SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of finfish). As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:

1. Regulations and MPA Design: Reduce the number of gear types and species allowed for take, improve the level of protection for the MPA, and extend MPA into deeper waters; or
2. Eliminate Emerald Bay SMCA from the proposal.

Cat Harbor SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of finfish, urchin and lobster, allows mariculture, and allows the commercial take of sea cucumber, lobster, and urchin). As proposed, this MPA has a low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:

1. Regulations: Reduce the number of gear types and species allowed for take, and improve the level of protection for the MPA; or
2. Eliminate Cat Harbor SMCA from the proposal.

Farnsworth SMCA

Concerns: A long list of excepted species and gear types to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 5 gear types and an extensive list of excepted species). Complex regulations such as this decrease enforceability and public understanding of the regulation. Also allows only two species (jumbo squid and striped marlin) by hook and line. Enforcement has concerns with the allowance for only two species by hook and line when a multitude of other species may be captured using the same gear, in similar locations.

- Options to Remedy:

1. Regulations: Reduce the number of gear types and species allowed for take, including the removal of jumbo squid and striped marlin by hook and line; or

2. Eliminate Farnsworth SMCA from the proposal.

Casino Point SMCA

Concerns: The proposed regulations provide little protection ecologically (MPA allows recreational take of urchin). As proposed, this MPA has a low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. The proposed regulations also include a special permit to allow urchin removal for urchin barren protection. Management schemes, such as the one proposed here constitutes fisheries management and is not in the purview of the MLPA.

- Options to Remedy:
 1. Regulations: Move the language requiring a special permit to take urchins from a regulatory requirement to a recommendation; and
 2. Regulations: Also improve the level of protection for this MPA by removing urchins as an allowed take (change to a SMR); or
 3. Eliminate Casino Point SMCA from the proposal.

Table 2. Summary of Department of Fish and Game feasibility concerns by MPA in SCRSG Final MPA Proposal 2. Proposed MPAs that are not recommended by the Department for implementation are indicated by **bold type** and an asterisk (*). Options to remedy MPAs that do not meet Department guidelines are provided in the text below the table.

Note: Feasibility ratings include “+” (meets all Department guidelines) or “-“(does not meet all Department guidelines). LOP= Level of Protection, VH=Very High, H=High, MH=Moderate High, M=Moderate, ML=Moderate-Low, L=Low.

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-------------------------|-----|---------------|-----------------------------|------------------|-------------|--|---|
| | | | | Boundaries | Regulations | | |
| Point Conception SMR | VH | Preferred | + | | | No Action Recommended | |
| Campus Point SMR | VH | Minimum | + | | | No Action Recommended | |
| Goleta Slough SMR | VH | N/A | + | | | No Action Recommended (using shape from MarineMap) | <ul style="list-style-type: none"> <u>Boundaries</u>: Using the shape provided in MarineMap, boundaries appear to meet guidelines. However, it is unclear if the boundaries meet guidelines using the written description provided. |
| Point Mugu SMRMA | VH | N/A | - | | | Modify MPA | <ul style="list-style-type: none"> <u>MPA Name</u>: Name implies the MPA is located offshore at Point Mugu. <u>Action</u>: The Department recommends changing name to Mugu Lagoon SMRMA. |
| Point Dume SMCA* | H | Preferred | - | | X | Modify MPA | <ul style="list-style-type: none"> <u>Take Regulations</u>: Complex regulations with a long list of excepted species and gear types to the general regulations make it difficult to understand and enforce. (MPA allows 5 different gear types and a long list of excepted species). <u>Action</u>: See General Comments below. |
| Point Vicente SMR | VH | Preferred | + | | | No Action Recommended | |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-------------------------|-----|--|-----------------------------|------------------|-------------|--|--|
| | | | | Boundaries | Regulations | | |
| Abalone Cove SMCA* | H | Below Minimum (Preferred cluster with Pt. Vicente SMR) | - | | X | Modify or Remove MPA Keep Clustered with Pt. Vicente SMR to Retain Size Requirement | <ul style="list-style-type: none"> • <u>MPA Design</u>: Receiving a + score for this MPA is dependent on linking, or clustering, with Pt. Vicente SMR. • <u>Take Regulations</u>: Complex regulations with a long list of excepted species and gear types to the general regulations make it difficult to understand and enforce. (MPA allows 5 different gear types and a long list of excepted species). • <u>Action</u>: See General Comments below. |
| Bolsa Chica SMCA* | ML | N/A | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows shore fishing by hook and line). • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Upper Newport Bay SMCA* | ML | N/A | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish). • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|--------------------|-----|---------------|-----------------------------|------------------|-------------|---|--|
| | | | | Boundaries | Regulations | | |
| Laguna North SMCA* | ML | Below Minimum | - | X | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Offshore boundary does not meet guidelines for use of diagonal lines. • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish and some invertebrates). • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs poses confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Laguna SMR | VH | Minimum | + | | | No Action Necessary but Changes Recommended | <ul style="list-style-type: none"> • <u>MPA Design</u>: While technically meeting the feasibility guidelines, the orientation of the MPA with the angle of the coastline may decrease public understanding and enforceability due to the angle of the coastline. The Law Enforcement Division (LED) finds this shape to be complex for public understanding offshore, and may trouble the courts in appropriate adjudications. Thus, LED recommends an alternate shape be identified for this site. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|---|
| | | | | Boundaries | Regulations | | |
| Laguna South SMCA* | ML | Below Minimum | - | X | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: The Department does not support the use of distance offshore to delineate boundaries. • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs poses confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. Does not meet SAT minimum size guidelines. • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows take of all finfish and some invertebrates). • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| San Dieguito Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| Del Mar SMR | VH | Minimum | + | | | No Action Recommended | |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-------------------|-----|---------------|-----------------------------|------------------|-------------|--|---|
| | | | | Boundaries | Regulations | | |
| La Jolla SMR | VH | Below Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> <u>Boundaries</u>: Boundaries do not meet feasibility guidelines. While there are current boundary markers, using a buoy is not recommended by the Law Enforcement Division due to the unpredictability of storms and heavy seas. Once a buoy has moved or been terminated, there will be no recognizable boundary marker, thus defeating the purpose of the SMR. Also, replacement of buoys may take days to weeks. While the boundary markers are maintained by local governments, these are subject to budgetary cuts. For this reason, enforcement does not recommend this type of management system. In lieu of this approach, The Law Enforcement Division recommends using recognizable land marks. <u>MPA Design</u>: Does not meet SAT minimum size guidelines. <u>Action</u>: Adjust outer western boundary to meet feasibility guidelines. |
| Famosa Slough SMR | VH | N/A | + | X | | No Action Recommended (using shape from MarineMap) | <ul style="list-style-type: none"> <u>Boundaries</u>: Using the shape provided in MarineMap, boundaries appear to meet guidelines. However, it is unclear if the boundaries meet guidelines using the written description provided. |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-----------------------|-----|--|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Sunset Cliffs SMR | VH | Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> <u>Boundaries</u>: Northwestern boundary does not meet feasibility guidelines for the use of diagonal lines; however, take regulations are enforceable as take within the Sunset Cliffs/Ocean Beach Pier MPA cluster is only allowed from the pier. <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Ocean Beach Pier SMCA | MH | Below Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> <u>Boundaries</u>: Southeastern boundary does not meet feasibility guidelines for the use of diagonal lines, however take regulations are enforceable as take within the Sunset Cliffs/Ocean Beach Pier MPA cluster is only allowed from the pier. <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Cabrillo SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |
| Bird Rock SMCA* | H | Below Minimum (Minimum cluster with Blue Cavern SMR) | - | | X | Modify MPA | <ul style="list-style-type: none"> <u>Take Regulations</u>: A long list of excepted species and gear types to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 4 different gear types and a long list of excepted species). <u>Action</u>: See General Comments below. |
| Blue Cavern SMR | VH | Below Minimum (Minimum cluster with Bird Rock SMCA) | + | | | No Action Recommended | |

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| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|--------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Casino Point SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. This MPA also does not meet SAT minimum size guidelines. • <u>Take Regulations</u>: Provides little protection ecologically due to the extensive allowed take (MPA allows pier fishing and the commercial take of all finfish and giant kelp). • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Lover's Cove SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: A long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 5 different gear types and a long list of excepted species). • <u>MPA Design</u>: Boundaries create a complex design that leaves an "open" area inshore of the northern portion of the MPA. This type of design reduces public understanding and enforceability of the regulation. • <u>Action</u>: See General Comments below. |
| Farnsworth SMCA* | H | Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: A long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 5 different gear types and a long list of excepted species). • <u>MPA Design</u>: Boundaries create a complex design that leaves an "open" area inshore of the northern portion of the MPA. This type of design reduces public understanding and enforceability of the regulation. • <u>Action</u>: See General Comments below. |
| Begg Rock SMR | VH | Preferred | + | | | No Action Recommended | <ul style="list-style-type: none"> • <u>Take Regulations</u>: A long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation (MPA allows 5 different gear types and a long list of excepted species). • <u>MPA Design</u>: Boundaries create a complex design that leaves an "open" area inshore of the northern portion of the MPA. This type of design reduces public understanding and enforceability of the regulation. • <u>Action</u>: See General Comments below. |

GENERAL COMMENTS on Final SCRSG MPA Proposal #2

Enforcement partners: In some instances, where proposed MPAs do not meet Department guidelines (e.g., irregular diagonal lines, multiple zoning, complex regulations), local enforcement or outreach partners have offered to provide local efforts to counter-balance Department concerns over infeasible boundaries or regulations. This has been reflected where State Park officers or local city marine enforcement are present, or where boundary markers are maintained by local governments. In these cases, partnership efforts are subject to budgetary cuts. In addition, the Department's Law Enforcement Division is the primary law enforcement agency responsible for patrolling and enforcing laws in Marine Protected Areas. Other agencies are subjected to their primary responsibilities, which may neglect the appropriate effort required for marine enforcement. Also, other agencies may not be fully equipped to provide adequate patrol such as boats, airplanes and special operations. Therefore, while the Department appreciates law enforcement partners, it cannot recognize these as "surrogates" for Department enforcement responsibilities in these instances, and the Department evaluation will apply standard feasibility criteria.

OPTIONS TO REMEDY- Final SCRSG MPA Proposal #2

Options to improve proposed MPAs that received a negative rating ("–") (indicated in the above table) are provided below.

Point Dume SMCA

Concerns: Regulations are complex and allow five gear types and a long list of excepted species. Complex regulations such as this decrease enforceability and public understanding of the regulation.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take.

Abalone Cove SMCA

Concerns: Regulations are complex and allow five gear types and a long list of excepted species. Complex regulations such as this decrease enforceability and public understanding of the regulation.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take;
or
 2. Eliminate Abalone Cove SMCA from the proposal.

Bolsa Chica SMCA

Concerns: Regulations are simple (MPA allows shore fishing by hook and line). However, the proposed regulations provide little protection ecologically. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:

1. Regulations: Improve the overall level of protection by reducing the number of species allowed for take; or
2. Eliminate Bolsa Chica SMCA from the proposal.

Upper Newport Bay SMCA

Concerns: Regulations are simple (MPA allows shore fishing and all take of finfish, by hook and line). However, the proposed regulations provide little protection ecologically. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:
 1. Regulations: Improve the overall level of protection by reducing the number of species allowed for take; or
 2. Eliminate Upper Newport Bay SMCA from the proposal.

Laguna North SMCA

Concerns: Regulations are complex and allow four gear types and a long list of excepted species, including the take of all finfish. Complex regulations such as this decrease enforceability and public understanding of the regulation. Additionally, proposed regulations differ slightly from those proposed at nearby Laguna South SMCA (MPA allows spearfishing). As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take, improve the overall level of protection, modify allowed take to match those proposed at Laguna South SMCA, and extend MPA into deeper waters; or
 2. Eliminate Laguna North SMCA from the proposal.

Laguna South SMCA

Concerns: Regulations are complex and allow four gear types and a long list of excepted species, including the take of all finfish. Complex regulations such as this decrease enforceability and public understanding of the regulation. Additionally, proposed regulations differ slightly from those proposed at nearby Laguna North SMCA (MPA does not allow spearfishing). As proposed, this MPA has a low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take improve the overall level of protection, modify allowed take to match those proposed at Laguna North SMCA, and extend MPA into deeper waters; or
 2. Eliminate Laguna South SMCA from the proposal.

Bird Rock SMCA

Concerns: Regulations are complex and allow four gear types and a long list of excepted species, including the take of all finfish. Complex regulations such as this decrease enforceability and public understanding of the regulation.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take.

Lover's Cove SMCA

Concerns: Boundaries have been improved compared to the existing MPA in the area. Regulations allow the commercial take of finfish and kelp, and the recreational take of all species by hook and line from the pier. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA.

- Options to Remedy:
 1. Regulations: Improve the overall level of protection by reducing the number of species allowed for take; or
 2. Eliminate Lover's Cove SMCA from the proposal.

Farnsworth SMCA

Concerns: Regulations are complex and allow five gear types and an extensive list of excepted species. Also, while the boundaries technically meet Department guidelines, the boundaries create a complex design that leaves an "open" area inshore of the northern portion of the MPA, which may interfere with public understanding and enforceability of the regulation.

- Options to Remedy:
 1. Regulations and Boundaries: Reduce the number of gear types and species allowed for take, and extend the eastern boundary to the shore to improve enforceability and public understanding of the regulation; or
 2. Eliminate Farnsworth SMCA from the proposal.

Table 3. Summary of Department of Fish and Game feasibility concerns by MPA in SCRSG Final MPA Proposal 3. Proposed MPAs that are not recommended by the Department for implementation are indicated by **bold type** and an asterisk (*). Options to remedy MPAs that do not meet Department guidelines are provided in the text below the table.

Note: Feasibility ratings include “+” (meets all Department guidelines) or “-“(does not meet all Department guidelines). LOP= Level of Protection, VH=Very High, H=High, MH=Moderate High, M=Moderate, ML=Moderate-Low, L=Low.

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|----------------------|------|---|-----------------------------|------------------|-------------|-----------------------|---|
| | | | | Boundaries | Regulations | | |
| Point Conception SMR | VH | Preferred | + | | | No Action Recommended | |
| Naples SMR | VH | Below Minimum | + | | | No Action Recommended | • <u>MPA Design</u> : Does not meet SAT minimum size guidelines. |
| UCSB SMR | VH | Minimum | + | | | No Action Recommended | |
| Goleta Slough SMR | VH | N/A | + | | | No Action Recommended | |
| Mishopsno SMCA | H | Minimum | - | | | Modify MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Boundaries meet guidelines. However, the southern intersects a beach which may reduce enforceability and public understanding. • <u>MPA Name</u>: The Department recommends the addition of a geographic based name (hyphenated with tribal name). • <u>Action</u>: The Department prefers adjustment to the southern boundary, and recommends the addition of a geographic reference in the name. |
| Mugu Lagoon SMRMA | VH | N/A | + | | | No Action Recommended | |
| Lachusa SMCA | High | Minimum (Preferred cluster with Point Dume SMR) | + | | X | No Action Recommended | <ul style="list-style-type: none"> • <u>MPA Name</u>: The Department recommends the addition of a geographic based name (hyphenated with tribal name). |

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|-----------------------|-----|---|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Point Dume SMR | VH | Minimum (Preferred cluster with Lachusa SMCA) | + | | | No Action Recommended | |
| Palos Verdes SMR | VH | Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Boundaries meet guidelines. However, enforcement has noted that the proximity of the southern boundary to long point and the eastern boundary splitting Abalone Cove may decrease public understanding and enforceability of the proposed regulation. • <u>Action</u>: Modify boundaries to those that are more easily understood by the public by not splitting the beach in half |
| Bolsa Chica SMR | VH | N/A | + | | | No Action Recommended | |
| Upper Newport Bay SMR | VH | N/A | + | | | No Action Recommended | |

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|---------------------|-----|---------------|-----------------------------|------------------|-------------|--|--|
| | | | | Boundaries | Regulations | | |
| Newport Coast SMCA* | ML | Below Minimum | - | X | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Offshore diagonal line does not meet guidelines. • <u>Take Regulations</u>: A long list of excepted species and gear types to the general regulation makes it difficult to understand and enforce the regulation. • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs poses confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Laguna Beach SMR | VH | Minimum | + | | | No Action Necessary, but Changes Recommended | <ul style="list-style-type: none"> • <u>MPA Design</u>: This meets the Department guidelines MPA boundaries. However, the Law Enforcement Division finds this shape to be complex for public understanding offshore, and may trouble the courts in appropriate adjudications. Thus, they recommend an alternate shape be identified for this site. |

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|--------------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|---|
| | | | | Boundaries | Regulations | | |
| Dana Point SMCA* | ML | Below Minimum | - | | X | Modify or Remove MPA | <ul style="list-style-type: none"> • <u>Take Regulations</u>: A long list of excepted species and gear types to the general regulation makes it difficult to understand and enforce the regulation. • <u>MPA Design</u>: The Department does not support the use of intertidal MPAs. The Law Enforcement Division notes that intertidal MPAs poses confusion with the public not knowing where the high water mark starts and the estimated distance seaward. This MPA also does not meet SAT minimum size guidelines. • <u>Likelihood to Meet Goals of Act</u>: Does not provide sufficient protection to meet the goals of the MLPA. • <u>Action</u>: See General Comments below. |
| Batiquitos Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| Swami's SMCA | H | Minimum | - | X | | Modify MPA | <ul style="list-style-type: none"> • <u>Boundaries</u>: Boundaries meet guidelines. However, the southern intersects a beach which may reduce enforceability and public understanding. • <u>Action</u>: The Department prefers the southern boundary be adjusted. |
| San Elijo SMR | VH | N/A | + | | | No Action Recommended | |
| San Dieguito Lagoon SMR | VH | N/A | + | | | No Action Recommended | |
| San Diego-Scripps Coastal SMCA | H | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> • <u>MPA Design</u>: Does not meet SAT minimum size guidelines. |

| MPA Name | LOP | Size Category | Feasibility Rating (+ or -) | Concern Category | | Recommended Actions | DFG Comments and Concerns |
|--------------------------|-----|---------------|-----------------------------|------------------|-------------|-----------------------|--|
| | | | | Boundaries | Regulations | | |
| Matlahuayl SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet SAT minimum size guidelines. MPA Name: The Department recommends the addition of a geographic based name (hyphenated with tribal name). |
| South La Jolla Reefs SMR | VH | Minimum | + | | | No Action Recommended | |
| Cabrillo SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet SAT minimum size guidelines. |
| Tijuana River Mouth SMCA | MH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet SAT minimum size guidelines. |
| North Catalina SMR | VH | Minimum | + | | | No Action Recommended | |
| Blue Cavern SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet SAT minimum size guidelines. |
| Long Point SMR | VH | Below Minimum | + | | | No Action Recommended | <ul style="list-style-type: none"> MPA Design: Does not meet SAT minimum size guidelines. |
| Farnsworth SMR | VH | Minimum | + | | | No Action Recommended | |

GENERAL COMMENTS - Final SCRSG MPA Proposal #3:

Enforcement partners: In some instances, where proposed MPAs do not meet Department guidelines (e.g., irregular diagonal lines, multiple zoning, complex regulations), local enforcement or outreach partners have offered to provide local efforts to counter-balance Department concerns over infeasible boundaries or regulations. This has been reflected where State Park officers or local city marine enforcement are present, or where boundary markers are maintained by local governments. In these cases, partnership efforts are subject to budgetary cuts. In addition, the Department's Law Enforcement Division is the primary law enforcement agency responsible for patrolling and enforcing laws in Marine Protected Areas. Other agencies are subjected to their primary responsibilities, which may neglect the appropriate effort required for marine enforcement. Also, other agencies may not be fully equipped to provide adequate patrol such as boats, airplanes and special operations. Therefore, while the Department appreciates law enforcement partners, it cannot recognize these as "surrogates" for Department enforcement responsibilities in these instances, and the Department evaluation will apply standard feasibility criteria.

OPTIONS TO REMEDY- Final SCRSG MPA Proposal #3

Options to improve proposed MPAs that received a negative rating ("–") (indicated in the above table) are provided below.

Palos Verdes SMR:

Concerns: While the boundaries technically meet Department guidelines, they create possible enforcement issues due to their complex nature which may confuse public understanding.

- Options to Remedy:
 1. Boundaries: Modify boundaries to address Department public understanding and enforcement concerns

Newport Coast SMCA

Concerns: Proposed regulations are complex and provide little protection ecologically. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats. Offshore boundary does not meet guidelines for the use diagonal lines.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take, and improve the level of protection for the MPA; and
 2. Boundaries: Redesign Newport Coast SMCA to conform to feasibility guidelines; or

3. Eliminate Newport Coast SMCA from the proposal.

Dana Point SMCA

Concerns: Proposed regulations are complex and provide little protection ecologically. As proposed, this MPA has a moderate-low level of protection and is unlikely to contribute towards meeting the goals of the MLPA. Also, intertidal MPAs that do not extend into deeper waters do not meet feasibility guidelines. These areas also do not follow the scientific guideline which recommends extending MPAs from shallow to deep habitats.

- Options to Remedy:
 1. Regulations: Reduce the number of gear types and species allowed for take, and improve the level of protection for the MPA; or
 2. Eliminate Newport Coast SMCA from the proposal.

Department of Fish and Game Evaluation of Goals and Objectives Identified in Round 3 Final Marine Protected Area Proposals for the South Coast Study Region

The Marine Life Protection Act calls for specific identified objectives for all MPAs [FGC Sub-sections 2853(c)(2) and 2857(c)(1)] developed under the MLPA initiative. In response, the MLPA south coast regional stakeholder group (RSG) adopted the six MLPA goals as regional goals and identified objectives.(Attachment 3). In determining MPA specific objectives the RSG assigned select regional goals and objectives to each MPA. In assigning these regional goals and objectives to specific MPAs the RSG attempted to determine the suite of objectives that best apply to the design and intent of the MPA. The application of these goals and objectives to specific MPAs serves an important role as design tools (influencing the allowed uses, boundaries, and specific placement of MPAs). As design tools regional and MPA objectives should not necessarily dictate or direct MPA evaluation.

The Master Plan for Marine Protected Areas provides clear guidance for developing objectives, and states that "...objectives should be realistically achievable, measurable, and defined within a limited time period...". Given the inference that MPA success might be measured against its stated goals and objectives it is important that objectives which are misaligned with the allowed uses or MPA intent be rectified prior to inclusion in the Master Plan for Marine Protected Areas.

The Department of Fish and Game (Department) Round 3 Goals and Objectives Evaluation is founded on Marine Life Protection Act (MLPA) Science Advisory Team (SAT) science guidelines and Department feasibility, as in previous evaluation rounds. These include evaluation results regarding level of protection (LOP), size and spacing, habitat replication and representation, and Department feasibility guidelines. Each MPA that is developed under the MLPA must contribute to meeting one or more of the MLPA goals. Therefore, the Department's Round 3 evaluation first identifies if each MPA met at least one or more of the MLPA goals, using the associated SAT- and Department-based evaluation elements displayed in Table 1. The evaluation reviews each proposal to highlight what goals and/or objectives are inappropriately applied to an MPA, and provides options to remedy MPAs with problematic goals and objectives (tables 2-4):

Table 1¹. Evaluation elements used to evaluate MPA goals within a proposed MPA.

| MLPA Goal | Evaluation Elements |
|---|--|
| 1. To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems | <ul style="list-style-type: none"> • Levels of protection • Habitat representation • Modeling • Birds and mammals |
| 2. To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted. | <ul style="list-style-type: none"> • Levels of protection • MPA size and spacing • Modeling • Birds and mammals |
| 3. To improve recreational, educational, and study opportunities provided by marine ecosystems that are subjected to minimal human disturbance, and to manage these uses in a manner consistent with protecting biodiversity. | <ul style="list-style-type: none"> • Habitat replication • (MPA and habitat size) • Recreational, educational & study opportunities |
| 4. To protect marine natural heritage, including protection of representative and unique marine life habitats in California waters for their intrinsic value. | <ul style="list-style-type: none"> • Levels of protection • Habitat representation and replication |
| 5. To ensure that California's MPAs have clearly defined objectives, effective management measures, and adequate enforcement, and are based on sound scientific guidelines. | <ul style="list-style-type: none"> • Department Feasibility Analysis • Department Goals and Objectives Analysis • State Parks feedback |
| 6. To ensure that the state's MPAs are designed and managed, to the extent possible, as a network. | <ul style="list-style-type: none"> • Size and spacing • Modeling |

In completing this evaluation of MPA proposals, the Department has recognized that objectives are relevant at different scales – some can be met by an individual MPA, while others are accomplished at the regional scale through several MPAs. Similarly, certain objectives are relevant only to implementation and are not directly relevant to the goal or can be accomplished regardless of their association with a particular goal. During the development of the SCRSG regional objectives, the Department provided guidance that certain identified objectives were inappropriately attributed to a particular goal and would be more appropriate as SCRSG implementation recommendations (objectives) that are additional to the MLPA goals. The following objectives are inappropriately attributed to specific goals (see attachment 1) or should be considered as implementation recommendations rather than MPA objectives:

- Objective 3, under Goal 3, seeks to provide opportunity for a broad spectrum of research involvement including linkages to other resource management measures classroom science curricula, and the identification of participants. While Goal 3 recommends improving recreational, educational, and study opportunities the desires inferred in this objective reach beyond the scope of the MLPA or MPA design capabilities, are not necessarily realistically achievable and are not defined within a limited time period.

¹ Derived from Marine Life Protection Act Science Advisory Team Draft Methods Used to Evaluate Marine Protected Area Proposals in the MLPA South Coast Study Region, June 16, 2009; p. 144.

- Objective 1, under Goal 5 specifically deals with socioeconomic concerns while the overarching goal speaks to clearly defined objectives, management measures, enforcement and using sound scientific guidelines.
- Objective 2 under Goal 5 suggests the development of monitoring, MPA evaluation, educational, and outreach plans by interested parties. While Goal 5 discusses clearly defined objectives and management measures the intent inferred in this objective reaches beyond what is realistically achievable within the design of a MPA and does not directly provide a mechanism for achieving the goal.
- Objectives 1 and 2 under Goal 6 strive to provide stakeholder involvement in management and MPA assessment but do not address the network of MPAs in a manner that is relevant to the goal.

Given the inference that regional and MPA specific objectives should be realistically achievable and measurable one might reasonably expect MPA success to be measured against each of its stated goals and objectives. Clearly in the above examples this could create insurmountable difficulties to evaluation in light of limited budgets, time and resource constraints, and inappropriateness to the regional goal. Although not appropriate for the MLPA goal, the Department recognizes the importance of these objectives to the SCRSG and recommends that these objectives not be included as MPA objectives but rather be viewed as examples of stand-alone implementation recommendations (objectives) even if the Department has assessed that the goal cannot be met by an MPA. For this reason these objectives are not identified in Tables 2-4 below.

Individual Evaluations of Goals and Objective by SCRSG Proposal

Table 2. Department of Fish and Game's evaluation of selected goals and objectives in **SCRSG Final MPA Proposal 1** (refer to Attachment 1 for descriptions of the goals and objectives).

| MPA Name | Contributes to One or More Goal | Inappropriate Goals and Objectives | Recommended Action |
|----------------------------|--|---|--|
| Point Conception SMR | Yes | n/a | n/a |
| Kashtayit SMP | Yes | G3 Objectives 1, 2; G5 Objectives 3,4, 5 | Remove |
| Naples SMCA | No | | Remove MPA |
| Devereux Lagoon SMR | Yes | G1 Objectives 1, 2, 3, 4, 5; G2 Objectives 1, 2, 3; G3 Objective 1; G4 Objectives 1, 2; G5 Objectives 3, 5; G6 Objectives 3, 4 | Remove |
| Helo SMR | Yes | n/a | n/a |
| Goleta Slough SMR | Yes | Inappropriate use of: G2 Objectives 1, 2; G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Carpinteria Salt Marsh SMR | Yes | Inappropriate use of: G2 Objectives 1, 2; G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Point Dume SMCA | Yes | n/a | n/a |
| Point Dume SMR | Yes | Inappropriate use of: G2 Objective 4 | Remove inappropriate goals and/or objectives |
| Palos Verdes SMR | Yes | Inappropriate use of: G2 Objective 4 | Remove inappropriate goals and/or objectives |
| Point Fermin SMCA | No | | Remove MPA |
| Bolsa Chica SMCA | Yes | Inappropriate use of: G2 Objectives 1, 2; G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Upper Newport Bay SMCA | Yes | Inappropriate use of: G2 Objectives 1, 2; G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Crystal Cove SMCA | No | | Remove MPA |
| Laguna SMR | Yes | n/a | n/a |

| MPA Name | Contributes to One or More Goal | Inappropriate Goals and Objectives | Recommended Action |
|---------------------------|---------------------------------|---|--|
| Dana Point SMCA | Yes | Inappropriate use of: G1 Objective 1; G2 Objectives 1, 2, 3, 4; G3 Objectives 1, 2; | Remove inappropriate goals and/or objectives |
| Batiquitos Lagoon SMR | Yes | Inappropriate use of: G2 Objective 2 | Remove inappropriate goals and/or objectives |
| San Elijo Lagoon SMR | Yes | n/a | n/a |
| San Dieguito Lagoon SMR | Yes | n/a | n/a |
| Del Mar SMR | Yes | n/a | n/a |
| Los Penasquitos Marsh SMR | Yes | n/a | n/a |
| La Jolla Cove SMR | Yes | Inappropriate use of: G2 Objectives 1, 2, 3, 4 | Remove inappropriate goals and/or objectives |
| La Jolla South SMR | Yes | Inappropriate use of: G2 Objective 4 | Remove inappropriate goals and/or objectives |
| La Jolla South SMCA | Yes | Inappropriate use of: G2 Objective 4 | Remove inappropriate goals and/or objectives |
| Famosa Slough SMR | Yes | Inappropriate use of: G2 Objective 1 | Remove inappropriate goals and/or objectives |
| Ocean Beach Pier SMCA | Yes | Inappropriate use of: G5 Objective 4 | Remove inappropriate goals and/or objectives |
| Ocean Beach SMR | Yes | n/a | n/a |
| Cabrillo SMR | Yes | Inappropriate use of: G2 Objectives 1, 2, 3; G5 Objectives 3, 5 | Remove inappropriate goals and/or objectives |
| Tijuana River Mouth SMCA | Yes | Inappropriate use of: G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Blue Cavern SMR | Yes | n/a | n/a |

| MPA Name | Contributes to One or More Goal | Inappropriate Goals and Objectives | Recommended Action |
|-------------------|---------------------------------|--|--|
| Emerald Bay SMCA | Yes | Inappropriate use of: G1 Objectives 2, 3, 4, 5; G2 Objectives 1, 2, 3, 4; G3 Objectives 1, 2; G4 Objective 1; G5 Objectives 3, 5 | Remove inappropriate goals and/or objectives |
| Cat Harbor SMCA | Yes | Inappropriate use of: G3 Objectives 1, 2; G6 Objective 4 | Remove inappropriate goals and/or objectives |
| Long Point SMR | Yes | Inappropriate use of: G2 Objectives 1, 2, 3; G5 Objective 3 | Remove inappropriate goals and/or objectives |
| Casino Point SMCA | No | | Remove MPA |
| Lover's Cove SMCA | Yes | n/a | n/a |
| Farnsworth SMCA | Yes | n/a | n/a |
| Begg Rock SMR | Yes | Inappropriate use of: G5 Objective 5 | Remove inappropriate goals and/or objectives |

Table 3. Department of Fish and Game's evaluation of selected goals and objectives in **SCRSG Final MPA Proposal 2.**

| MPA Name | Contributes to One or More Goal | Issues to resolve | Action Alternative (Options to Remedy) |
|----------------------|---------------------------------|--|--|
| Point Conception SMR | Yes | n/a | n/a |
| Campus Point SMR | Yes | Inappropriate use of: G5 Objective 5 | Remove inappropriate goals and/or objectives |
| Goleta Slough SMR | Yes | Inappropriate use of: G2 Objective 1 | Remove inappropriate goals and/or objectives |
| Point Mugu SMRMA | Yes | Inappropriate use of: G2 Objectives 1, 2; G5 Objective 5 | Remove inappropriate goals and/or objectives |
| Point Dume SMCA | Yes | n/a | n/a |
| Point Vicente SMR | Yes | Inappropriate use of: G5 Objective 5 | Remove inappropriate goals and/or objectives |
| Abalone Cove SMCA | Yes | Inappropriate use of: G5 Objective 4 | Remove inappropriate goals and/or objectives |

| | | | |
|-------------------------|-----|---|--|
| Bolsa Chica SMCA | No | | Remove MPA |
| Upper Newport Bay SMCA | No | | Remove MPA |
| Laguna North SMCA | No | | Remove MPA |
| Laguna SMR | Yes | Inappropriate use of: G5 Objective 4 | Remove inappropriate goals and/or objectives |
| Laguna South SMCA | No | | Remove MPA |
| Del Mar SMR | Yes | n/a | n/a |
| San Dieguito Lagoon SMR | Yes | Inappropriate use of: G2 Objective 1 | Remove inappropriate goals and/or objectives |
| La Jolla SMR | Yes | Inappropriate use of: G2 Objectives 1, 3 | Remove inappropriate goals and/or objectives |
| Famosa Slough SMR | Yes | Inappropriate use of: G2 Objectives 1, 3 | Remove inappropriate goals and/or objectives |
| Ocean Beach Pier SMCA | Yes | Inappropriate use of: G5 Objective 3 | Remove inappropriate goals and/or objectives |
| Sunset Cliffs SMR | Yes | Inappropriate use of: G2 Objective 4 | Remove inappropriate goals and/or objectives |
| Cabrillo SMR | Yes | n/a | n/a |
| Bird Rock SMCA | Yes | Inappropriate use of: G5 Objective 4 | Remove inappropriate goals and/or objectives |
| Blue Cavern SMR | Yes | n/a | n/a |
| Casino Point SMR | Yes | n/a | n/a |
| Lover's Cove SMCA | No | | Remove MPA |
| Farnsworth SMCA | Yes | n/a | n/a |
| Begg Rock SMR | Yes | n/a | n/a |

Table 4. Department of Fish and Game's evaluation of selected goals and objectives in **SCRSG Final MPA Proposal 3.**

| MPA Name | Contributes to One or More Goal | Issues to resolve | Action Alternative (Options to Remedy) |
|----------------------|---------------------------------|---|--|
| Point Conception SMR | Yes | n/a | n/a |
| Naples SMR | Yes | n/a | n/a |
| UCSB SMR | Yes | n/a | n/a |
| Goleta Slough SMR | Yes | Inappropriate use of: G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Mishopsno SMCA | Yes | Inappropriate use of: G6 Objective 3 | Remove inappropriate goals and/or objectives |

| MPA Name | Contributes to One or More Goal | Issues to resolve | Action Alternative (Options to Remedy) |
|--------------------------------|--|---|---|
| Mugu Lagoon SMRMA | Yes | Inappropriate use of: G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Lachusa SMCA | Yes | n/a | n/a |
| Point Dume SMR | Yes | n/a | n/a |
| Palos Verdes SMR | Yes | n/a | n/a |
| Bolsa Chica SMR | Yes | n/a | n/a |
| Upper Newport Bay SMR | Yes | n/a | n/a |
| Newport Coast SMCA | No | | Remove MPA |
| Laguna Beach SMR | Yes | n/a | n/a |
| Dana Point SMCA | No | Inappropriate use of: G1 Objectives 1, 2, 4, 5; G2 Objective 3; G3 Objectives 1, 2; | Remove MPA, none of the identified goals and objectives are appropriate |
| Batiquitos Lagoon SMR | Yes | Inappropriate use of: G2 Objective 1; G6 Objective 3 | Remove inappropriate goals and/or objectives |
| Swami's SMCA | Yes | n/a | n/a |
| San Elijo Lagoon SMR | Yes | Inappropriate use of: G2 Objectives 1; G6 Objectives 3 | Remove inappropriate goals and/or objectives |
| San Dieguito Lagoon SMR | Yes | Inappropriate use of: G6 Objective 3 | Remove inappropriate goals and/or objectives |
| San Diego-Scripps Coastal SMCA | Yes | Inappropriate use of: G2 Objective 3; G6 Objective 3,4 | Remove inappropriate goals and/or objectives |
| Matlahuayl SMR | Yes | Inappropriate use of: G2 Objectives 1, 3; G6 Objective 3,4 | Remove inappropriate goals and/or objectives |
| South La Jolla Reefs SMR | Yes | n/a | n/a |
| Cabrillo SMR | Yes | n/a | n/a |
| Tijuana River Mouth SMCA | Yes | Inappropriate use of: G6 Objectives 3, 4 | Remove inappropriate goals and/or objectives |
| North Catalina SMR | Yes | n/a | n/a |

| MPA Name | Contributes to One or More Goal | Issues to resolve | Action Alternative (Options to Remedy) |
|-----------------|---------------------------------|---|--|
| Blue Cavern SMR | Yes | Inappropriate use of: G2 Objectives 1, 2, 3; G6 Objective 4 | Remove inappropriate goals and/or objectives |
| Long Point SMR | Yes | n/a | n/a |
| Farnsworth SMR | Yes | n/a | n/a |