

## Staff Summary for October 13-16, 2026

**31. Petition 2023-19MPA\_AM1 (New Chitqawi SMCA near Morro Bay, Tribally Led)****Today's Item****Information** ☒**Action** ☐

Request to designate a new MPA near Morro Bay as "Chitqawi SMCA" that only includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

***[This petition has been withdrawn by the petitioner \(Exhibit 1\).](#)***

**Summary of Previous/Future Actions (N/A)****Background (N/A)****Significant Public Comments**

See Exhibit 2 for the public comments received for this agenda item.

**Recommendation (N/A)****Exhibits**

1. [Email from Natalie Landreth, Nashoba Consulting, withdrawing petition 2023-19MPA](#), received September 27, 2026
2. [Public comments received for Petition 2023-19MPA\\_AM1](#) for this agenda item

**Motion (N/A)**

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**withdrawal of petition 2023-19MPA**

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**From** natalie@nashobaconsultingllc.com

**Date** Sun 09/27/2026 08:50 PM

**To** Miller-Henson, Melissa [REDACTED] FGC <FGC@fgc.ca.gov>

**Cc** Nakia Lent <NZavalla@chumash.gov>

Hello Melissa and Commissioners –

The Santa Ynez Band of Chumash Indians is formally withdrawing petition number 2023-19MPA, known as Chitqawi. Please let me know if any other action is required for this withdrawal.

Thank you,  
Natalie

Natalie Landreth  
Nashoba Consulting, LLC  
[natalie@nashobaconsultingllc.com](mailto:natalie@nashobaconsultingllc.com)  
907-360-3423



8-8-26

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To Whom It May Concern:

My Name is Kenneth Pierce, Council member and Tribal elder of the Salinan Tribe of Monterey and San Luis Obispo Counties. I was raised in our tribal territory and my family as far back as the 1600s, have fished these waters. The central coast has always been the home of our Salinan tribe. Native and commercial fishing is our lifestyle, many members of my family were commercial fishermen.

Through my lifetime there has been a slow encroachment of our territory! Our boundaries are from southern Monterey County south to the Santa Marie River and east to the Temblor Mountains.

The area of the the proposed Chitqawi Marine Protected Area in Morro Bay, California is a direct assault and encroachment of our territory and our cultural life style, as well as to the many commercial fishermen in this area that it would affect. Allowing only the CHUMASH to fish the area would be historically incorrect, and another violation against our Salinan Tribe and cultural territory.

I'm opposed to any Marine Protected Area proposed in Morro Bay, California that would close our territorial waters to fishing for our tribal families, as well as damaging the commercial fishing industry greatly.

Thank You for Your attention to this matter,

Kenneth J. Pierce

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**Estero/Morro Bay MPA proposal - No. 2023-19MPA**

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**From a** [REDACTED]  
**Date** Tue 08/11/2026 12:18 PM  
**To** FGC <FGC@fgc.ca.gov>

Like many local residents, I have just found out about this proposed MPA. And, like many, I am also against it for the following two reasons.

- 1) It would be economically damaging to the Sport Fishing Industry of our area.
- 2) It is not right to ignore our CA Constitutionally given fishing rights. Especially, if only protecting those rights for one specific group of Californians, i.e. one (Santa Ynes) tribe of Chumash.

Respectively,

Al Pawlowski - born in CA and living in Los Osos

RE: Petition 2023-19MPA (the proposed Chitqawi State Marine Conservation Area near Morro Bay)

To the California Fish and Game Commission,

My name is Thomas Ross, I'm a former resident of Morro Bay and Cayucos and a professional archaeologist residing in San Luis Obispo County. I've reviewed the petition and California Fish and Wildlife evaluation for the Chitqawi State Marine Conservation Area and I'm concerned for several of the cultural, ecological, economic, and civil impacts this petition would have on the people and wildlife in the Morro Bay area.

On the name *Chitqawi* and alternative names:

The National Oceanic and Atmospheric Administration (NOAA) set a precedent when acknowledging the co-habitation of Morro Bay by the Salinan and Chumash cultural groups and choosing to exclude Morro Bay from the boundary of the Chumash Heritage National Marine Sanctuary in part due to the inter-tribal disagreement with imposing a single tribal name over a shared area (NOAA 2024: 127). NOAA declared that if, in the future, the Chumash Heritage National Marine Sanctuary were to expand north of Diablo Canyon Power Plant, including Morro Bay, NOAA would consider renaming the entire sanctuary to adjust for these sensitivities since the boundaries would no longer be covering coastline that was predominately ancestral Chumash territory. The proposed Chitqawi State Marine Conservation Area (SMCA) lies offshore of coastal lands which were occupied by Salinan and Chumash peoples but whose namesake originates from a Chumash village established in the area. That the Santa Ynez Chumash would choose a Chumash name for the proposal isn't unexpected, but it follows that a reprieve in this inter-tribal disagreement should also be expected. Whereas *Chitqawi* carries meaning to Northern Chumash groups, Salinan elders whom I have spoken to do not identify with the term. Allowing for a Chumash name to map over a tribal-contested part of Morro Bay runs counter-intuitive to NOAA's considerations and would place State of California naming logic at odds with Federal goals for name neutrality. If I could make a suggestion, the SMCA should be renamed for the adjacent Morro Rock, which is *Le'samo'* in Salinan and *Lisamu* in the Chumash language. This writer is not interested in the semantic differences between the two words, but is more interested in emphasizing the commonality of these two very similar words which express a shared reverence for this sacred site imposing on the skyline directly above the waters in question.

On the California Department of Fish and Wildlife (CDFW) evaluation:

The CDFW cites a number of impacts this petition would have to the local marine ecology, coastal economic activity, and common access to public waters. CDFW determined the proposed 8.45 square mile marine protection area is inadequate for the restoration goals for sandy beach and shallow hard and soft bottom habitats, as well as rejected the idea of adding a new marine protection area in Morro Bay, stating Chitqawi SMCA is "unlikely to confer ecosystem or connectivity benefits beyond what the existing MPAs in the area already provide" (CDFW 2026: 31). Prohibiting commercial fishing and greatly restricting recreational fishing in the Chitqawi SMCA would shift fishing pressures onto other nearby and less-protected coastal zones, effectively creating a "domino effect" of food supply chain disruption which the state will have failed to analyze per the California Environmental Quality Act.

The CDFW report also falls short of regarding the effect to the environment for the drastic reduction of human activity from an ecosystem which has evolved for over 10,000 years alongside human selective pressures imposed upon biological resources. The CDFW acknowledged, "While the primary function of MPAs in California is to protect and enhance marine habitats and populations, understanding how effective fisheries management measures interact with a functioning MPA Network to bolster resiliency to climate change in California is still a critical knowledge gap" (CDFW 2026: 28). Biodiversity cannot

be fully restored without human involvement, selective pressures imposed upon fish, marine invertebrates, and kelp forests, as observed within the boundaries of the proposed Chitqawi SMCA, create a mosaic of ecological niches. However, if left unbalanced, overgrowth could choke out micro-habitats or trigger an artificial ecological collapse. Native Californian methods of resource management are essential to the cause for restoration, the continuation of hand-harvesting resources is the explicit goal of legal instruments like State Marine Conservation Areas. Restrictions on recreational harvesting, which drastically lower the number of participants, would achieve the opposite effect of properly-implemented traditional ecological management practices. The Santa Ynez Band of Chumash Indians initially described their intent to co-manage these waters with California agencies, local commercial fisheries, and other tribal groups, who all demonstrate an interest in responsibly and equitably stewarding coastal resources. The petition proposal to establish a take-exclusion for a single group violates the spirit of the Marine Life Protection Act which holds that public waters shall be accessible to all members of the public and cannot legally be carved up for exclusive use by one group. This socio-political exemption extends beyond the purpose of marine biology protection which was the original intent in establishing the Chitqawi SMCA.

#### On cultural resource protection in the area:

Considering that Chitqawi SMCA may overlap with portions of the undiscovered historic Chumash village Chitqawi, as well as known archaeological sites associated with Atascadero Beach and Morro Rock, CDFW recommended establishing a State Marine Cultural Preservation Area (SMCPA) to protect cultural resources: “Designating this area as an SMCPA would prohibit the damage, take, or possession of any cultural resources, acknowledge the cultural significance of the area, while also preserving any historic objects in the area, for example, artifacts from submerged village sites” (CDFW 2026: 30) An SMCPA is a more appropriate legal instrument which would protect marine ecology and underwater cultural resources. CDFW revealed that cultural resource protections represent a current management gap since no SMCPAs exist in the MPA network. Additionally, the designation would avoid limitations on fishing access for subsistence and take exclusions associated with ceremonial practices for Santa Ynez Band of Chumash Indians and other local tribal organizations.

#### Conclusion

California Fish and Game Commission, California Department of Fish and Wildlife, and California Department of Parks and Recreation should enter into consultation with state- and federally-recognized tribal organizations regarding SMCA language, access, protection of cultural resources, and exclusion for ceremonial practices. Revising the name of the protection area to a more neutral term would align State interests with Federal interests towards impartiality. CDFW recommendations to establish State Marine Cultural Preservation Area should be further reviewed for efficacy towards state and federal marine resource protection goals. Further environmental impact studies should be completed to address research gaps regarding the size and effectiveness of additional marine protection areas in Morro Bay, impacts to commercial fisheries and local community food supply chains, domino effects on shifting commercial fishing locations, considerations for vastly reducing public access and fishing pressures on an ecosystem reliant on human management, and constitutional issues regarding public access restrictions to exclusive groups.

#### References cited:

California Department of Fish and Wildlife. July 2026. Evaluation of 2023 Decadal Management Review Marine Protected Area Petition: Designate a New Chitqawi SMCA Near Morro Bay With a Tribal Take Exemption for Santa Ynez Band of Chumash Indians (2023-19MPA\_AM1).

National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries. 2024.  
Chumash Heritage National Marine Sanctuary Final Environmental Impact Statement: Volume II.  
Silver Spring, MD.

**Date:** August 11, 2026

**To:** California Fish and Game Commission Tribal Committee

**Re:** Petition 2023-19MPA\_AM1 - Proposed Chitqawi State Marine Conservation Area

Dear California Fish and Game Commission Tribal Committee,

My name is Bonnie Pierce-I am a Salinan Elder, raised from birth in Morro Bay; and educated in the Salinan Cultural tradition, along the coast of our Salinan Territory. I am the daughter of Ancestor (ER) 'Skinner Pierce' from "McCormack lineage back 13 generations to Agata Marie in 1673, as documented on the wall at San Antonio Mission; and confirmed by our blood-tie to Salinan Ancestors & by our continuity of our continued Native governing system. I am a member within the Salinan Tribe of Monterey and San Luis Obispo counties & member of our Elder's Council. As a Native Scholar, I offer my volunteer services at the Administrative level, as an Elder lead within our Cultural Education Department. Elder Council and Tribal Council work together in service to our General Council=all members within our tribe. A current number of Elders (65+ years) (approximately=147).; each honored as Wisdom Keepers & Cultural bearers, ensuring the Salinan Tribe's Cultural knowledge is available for our future generations.

Tribal council (Elders) Ken Pierce & John Piatti; along with Michael Woody, Bruce Flood, Robert Piatti have been involved with the MPA's at Commission meetings. As one MPA gives us concern-I was approved to relay Elder Council input to your Tribal Committee. on the MPA's. Our Elders use traditional cultural knowledges; *not defined by today's terms such as 'licensed sportsman, professional; consumerism'; all communication ways to hide individual wants to 'make a dollar life-style, with a loss of trust and deceased connections of communities.*

Our Cultural Principal-based practices come from a long lineage of Ancestors who survived numerous challenges; making it harder to give back in 'Stewardship', sharing *Sacred Mother Earth's resources*. This basic principal is not about ownership, as no one really "owns nature", land; ocean, wind/air; fire elements. I recently heard a statement, "*The only difference between all living forms of life is that 'humans have a longer memory'*". Today in 'modern world' many justify the need for 'OWNERSHIP'. The appeal of '*DOLLAR POWER*' clouds "*Resource Stewardship*" confusing and dividing conversation on resource management.

I am here to address any misunderstands, to the state of California's Fish & Game Commission our Tribe's Elder Council's cultural aspect can help with; including understanding major/minor procedural errors with the word Stewardship and the intent written in 2023-19 MPA submitted by the Santa Ynez Band of Chumash Indian Tribe, as well as their amendment request for full-control as only one voice-theirs-over land/water resources-that lie within Salinan Territory.

Santa Ynez Band of Chumash Indians (SYBCI) has Federal Acknowledgement. However that does not give them, or any other 'non-Salinan entities' (native or not) move to gain single control over Salinan territory; creating confusion from Non-Native entities who do not want to disrespect but are asking, "*Which Indian tribe; which non-native group; which native governing body, which-native governing body is in charge?*" A name on a marine sanctuary does

not mean controlling territory. All five MPA's link back to using the name "Chumash" name=A SINGLE VOICE of major resource decisions? America's history is soiled with strategies such as this-as noted in public school history's stories/books when immigrations decided ways to control resources. As the story goes, immigration to our America was believing land went on forever with plenty for all (by just ignoring People/Nations/Stewards) who were already there.

General Public Comment this Commission gives-as noted, yet are not heard or understood, because two varying world views-Indigenous thinking and USA governing views use 'very different processes to what they hear/read (as noted in the MPA's). And, why our Salinan Tribe of Elders appreciate adding Tribal Committee-input processes-that recognize the need for more than just one way to achieve the goal(s).

Salinan people along the "Central-to Northern" Pacific West coastline have for a longer history been known as Salinan Territory. As the Native Stewards we have many generations of Salinans who have lived, steward cultural education of Indigenous ways long before a little town named Morro Bay happened. Other American citizens came; to protect the coast from invasion by war, to earn a living from its land and/or water, and have kept 'a *small fishing community mindset* of *how much can one share outward with the resources at hand?* Salinan People quietly continue to live for many generations before, during, and up to today, in Morro Bay, and that coast line.

The past is not the past to Salinan people. Fishery industry created various economic development opportunities to 'make a living.' As more visitors-Tourist- come to view this beautiful piece of the West Coast, their choices impacted 'locals'. impacting the original Stewards=the Salinan People. To complicate the decision-making process more, it appears Natives want more control of resources outside their territory? That is not our Salinan way. And, from comments coming in, is a problem growing for many of the of Native Tribes up and down the entire Western side of our America's?

Native conversations must come together; not to overtake resources within another Native territory. Using Native Elder Wisdom and Knowledge of the first Fishers, the first hunters, the first Gatherers=Indigenous thinking has work to hold precious the limited resources, as well as to correct over-use of resources. This includes honoring the 'expressions' (ceremonies, practices, ways of knowing). To this goal, Salinan Elders have not been consulted by our Chumash Nation to South. Using the name- Chumash; is no different when other decide to live in Morro Bay and believe that makes it theirs? Territory Stewardship has cultural principals. Perhaps confusion is interpreting the intent? But only one voice heard that changes territory boundary responsibility is not the answer. Use USA governing methods to make it sound official adds confusion.

I bring a Chumash Elder's Talking Stick that was gifted to me. She (Adelina) once sat on Santa Ynez Chumash Council. Throughout her life, she partnered well as a spokesperson for their Tribal Band. And was a wonderful example of understanding the cultural practices of inclusion. When working with or in Salinan Territory, she gave Respect of Elder Wisdom and territorial Stewardship. This is not what Fish and Game Commission Tribal Committee should lead.

To throw an additional outcome such as controlling our Morro Bay land and ocean affects our cultural traditions; our livelihood; etc. Adding additional '*Chumash named*' entities (native or not) through the MPA process is not the answer. The words used seem to be a way to gain control over the Central Coast/Northern California coast? Morro Bay Rock-our Great One-once blown up for quarry material still remains solid. Yet, twenty-six years ago the Salinan Tribe (no other) worked to ensure Native cultural practices could continue without harming natural resources.

Moving southern territory boundaries is not the answer by using a name=*Chumash Marine Sanctuary*. Morro Bay is different than Santa Barbara, yet the same growth that concerns your native territory is an issue you could continue to address, and by listening to other Territorial input gain ways to repair your territorial resources. Do not silence our documentation of continued cultural stories from our Ancestors as well as practicing cultural ceremony via our Salinan expressions. That does not speak well.

For the Tribal Commission, we have around 80 Elders of our 147 with direct lineal ties to our Morro Bay (and more going from central to north along the coast); east is not set my San Luis Obispo Mission (historically all native people along the path of Spanish Mission Era) were pulled in as 'slaves' from their original territory. Let us not be confused?

The Salinan Coastal people today living are 4 to 5 generations, sitting with many back 10+ documented lineal ties within the Salinan territory of native/non native fishers, ranchers; hunters, food sovereignty and growing businesses-I think we have lots of talented, educated residents to give input. Morro Rock/ "The Great One"-we share, North, South, East, and now West via the Ocean power struggles are NOT up for discussion. What the F & G Commission's Tribal Committee 'Alternative Planning' is the tool to come together.

We are offering to expand our discussion to include our Salinan Elder Cultural Knowledge. We have volunteers (myself today-only because the other two are hunting as Elders today) who are willing to help give our Tribe's Cultural input.

Thank you to SYBCI- one day I hope to share Adelina's story as I hold her talking stick today. Our Elders and your Elders could talk to better understand your needs? Other tribal and non-tribal entities-have a talent for ways to resolve resource issues. Do not forget our Salinan people/tribe, although quiet, as Stewards, have Elder Council and Tribal Council leads ready to discuss co-management ideas for the above. I thank the Fish and Game Tribal and overall Commission helping to support these discussions... Let us not forget our native culture can help educate our America citizens in ways to manage land, ocean resources.

Thank you,

Elder, Bonnie Pierce





Outlook

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## MPA'S

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**From** Bill Luffee

**Date** Tue 08/11/2026 05:07 PM

**To** FGC <FGC@fgc.ca.gov>

To who it may concern, I am a city council member from Morro Bay, Ca and I am writing in strong opposition to the 3 proposed MPA'S Morro Bay Harbor, Point Buchon, and Point Sal. Within these areas there already is enough protected areas and these will be determinate to the livelihood of the fisherman and fisherwomen in these areas. enough already

Bill Luffee



Sent from my iPhone

California Coastal Commission  
 "California Dept of Fish and Wildlife"  
 "Cabrero Marine Protected Area"

Dear Sirs

My name is Pamela Price Flood I am a member of the Salinan Tribe of Monterey and San Luis Obispo Counties. I serve on the business council of my tribe and have for twenty four years. In regards to the proposed plan to close all waters in Morro Bay Ca for all fishing. My family has a long history of fishing and I oppose this idea. My father was born in Morro Bay in 1926, with his brothers started the first Commercial Abalone industry in Morro Bay. In my experience once something is taken away it does not return. We as natives have been here thousands of years and we have always known how to keep our land & water healthy. "What do we gain by this closure." I live in Morro Bay and realize the impact this closure would have on Fishermen, restaurants, all business, tourism, etc. I hope you reconsider your plan and realize the impact and the consequences of your decision.

Sincerely,

Pamela Flood

Social Lead

Salinan Tribe of Monterey and San Luis Obispo  
 Counties

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**Tribal MPA's**

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**From** Paavo Carroll

**Date** Wed 08/12/2026 09:38 AM

**To** FGC <FGC@fgc.ca.gov>

Hello Commission,

I am a commercial fisherman currently and for the last 12 years operating primarily out of Morro Bay. I am writing because I cannot support any new MPA's, particularly so near the Rock which for us is a bad weather fishing refuge, also a low expense fishing refuge, given its proximity to the harbor. Truly that is a MPA only the Fish and Wildlife wardens could love. I can see them now, lurking amongst the surfers with binoculars, harassing people for their tribal papers.

Anthony certain NGO's would have us believe that all MPA's are miraculously effective, for me the science simply isn't there. Aside from some tropical ones in other parts of the world, in some very degraded ecosystems, the benefits here in the US have yet to be meaningful to commercial fishers. Most things the MPAs purport to make happen, could be made to happen using existing fishing regulations.

What I do support, however, wholeheartedly and without reservation, is the Tribal right to fish however they would like, wherever they would like, not just in existing MPA's but all up and down the coast, whether for cultural reasons, subsistence reasons or for profit. Nor am I one of these strange folk who insists such fishing would have to take place with 1700's technology. I would suggest taking a look, for example, at some of the First Nations fisheries in Canada. I don't understand why the fight, if there is one, for this right has to be intertwined with MPA's.

Thank you.

Paavo Carroll

F/V Esther Louise

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## proposed fishing restriction

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**From** randy nash

**Date** Thu 08/13/2026 07:30 PM

**To** FGC <FGC@fgc.ca.gov>

To Whom it May Concern:

I am writing to state my great dismay upon hearing of the proposed Morro Bay MPA (#2023-19MPA). This besides being unjust would be a great hardship and disservice to all of the individuals, fishing families, and a variety of fishing businesses out of Morro Bay.

The ocean belongs to all of us or none of us. I know a number of families in Los Osos and Morro Bay whose livelihoods for decades has depended upon fishing in this area of the Pacific Ocean.

Please do not establish this SMPA.

Thank you,  
Sincerely,  
Randy Nash



# **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

## **Proposed Chitqawi State Marine Conservation Area**

**Date:** August 11, 2026

**To:** California Fish and Game Commission Tribal Committee

**Re:** Petition 2023-19MPA\_AM1 - Proposed Chitqawi State Marine Conservation Area

Dear California Fish and Game Commission Tribal Committee,

My name is Jennifer Lee Freeman. I am a Salinan Tribal member, born and raised in Morro Bay. My family has a multi-generational history of hunting, fishing, gathering, and living along California's Central Coast, from the Santa Maria River north toward Big Sur.

I submit these comments as an individual, drawing on my lived experience, informal and formal education, family history, and relationship with this place. I also appreciate California's efforts to strengthen Tribal stewardship, consultation, and co-management. I believe these efforts are important and long overdue. At the same time, Petition 2023-19MPA\_AM1 asks us to consider a larger question:

What does it truly mean to protect a place?

For Indigenous peoples, conservation has never meant protecting a single species or drawing a boundary on a map. The ocean, estuaries, creeks, mountains, plants, animals, people, and communities are part of an interconnected living system. A watershed does not stop at a jurisdictional boundary. Ocean currents do not stop at the edge of a marine protected area. Fish do not recognize political boundaries. Neither did our ancestors.

My education about these relationships did not begin at university. It began in Morro Bay. As a child, I spent countless hours exploring tide pools, watching birds, observing tides, fishing, gathering, and asking why some places were full of life and how they changed with the seasons. Long before I learned the academic term Traditional Ecological Knowledge, I was learning through observation, participation, family teachings, and a relationship with place. I recently completed my master's degree at Oregon State University and am preparing to continue doctoral research focused on Traditional Ecological Knowledge (TEK) and the natural resources of our Salinan Tribal territory. I am working with Salinan Tribal Elders to help document and carry forward their knowledge for future generations, while helping bridge Indigenous Knowledge and Western science in fisheries, wildlife, and conservation.

Higher education has given me another language for describing something our people have understood for generations: everything is connected. My family's relationship with this coastline extends across generations. Fishing and gathering from the ocean were never simply recreational activities. They were and are food, sharing, knowledge, stories, family, and are part of who we are. That is why I am deeply concerned about Petition 2023-19MPA\_AM1. As currently proposed, the new Chitqawi State Marine Conservation Area would be no-take, except for a tribal take exemption for the Santa Ynez Band of Chumash Indians. I strongly support Tribal stewardship and meaningful Indigenous participation in the management of ancestral lands and waters. But I do not believe that strengthening one Indigenous relationship should require restricting or diminishing another.

CDFW's July 2026 evaluation identifies this concern. The Department states that consumptive activities within the proposed MPA would be prohibited for other federally recognized and non-federally recognized tribes currently harvesting in this area. A federally recognized tribe could later petition for an exemption, but CDFW also states that there is currently no pathway for non-federally recognized tribes to obtain that exemption. That matters deeply to the Salinan people, and I believe it should concern everyone involved in this decision. For generations, Indigenous peoples in California have watched others draw boundaries across our homelands: missions, ranchos, private property, counties, state and federal jurisdictions, and reservations. Those boundaries transformed Indigenous landscapes into administrative

Page 1 of 3

*Submitted as an individual. These comments do not represent an official position of the Tribe.*

Primary source for technical statements: California Department of Fish and Wildlife, Evaluation of 2023 Decadal Management Review Marine Protected Area Petition 2023-19MPA\_AM1, July 2026.

## **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

### **Proposed Chitqawi State Marine Conservation Area**

spaces. Now we are discussing another boundary - this time in the ocean. I understand that contemporary resource management requires boundaries. But I ask the Committee to consider whether those boundaries should also become a mechanism for determining which Indigenous relationships to a place are recognized and which are not. Traditional territories were not simply straight lines drawn across maps. Our relationships followed watersheds, mountains, estuaries, villages, seasonal movement, kinship, language, gathering areas, fishing grounds, and ecological cycles. When conservation begins only with lines on a map, we risk protecting habitat while overlooking the cultural landscape that has existed within it for thousands of years.

The name of the proposed area also warrants careful consideration. Names matter because place names carry language, stories, history, identity, and relationships to land and water. Naming this protected area “Chitqawi” does more than give a new MPA a title. If adopted by the State of California, that name becomes part of the official public representation of the Indigenous history of this place. Morro Bay is part of the Salinan people’s ancestral and continuing cultural landscape. Our language, our place names, our families, our fishing traditions, and our relationships with these waters are still here. If California is going to place an Indigenous name on a protected area in Morro Bay, the Salinan people need to be part of the conversation about what that area is called. This is another reason I support the Alternative Pathway. It allows us not only to redraw a boundary but also to bring together the Indigenous peoples connected to this place and ask: Whose histories are represented? Whose languages are represented? And how can the name of this place reflect the multiple relationships that have existed here since time immemorial?

My understanding is that the State's own evaluation also raises important scientific and management questions. The proposed Chitqawi SMCA is 8.45 square miles, below the 9-square-mile minimum size criterion for connectivity goals set by the Science Advisory Team guidelines. CDFW also found that the habitats identified in the petition are already well represented in the region. Nearly 27% of state waters between the Piedras Blancas and Point Buchon MPA clusters are already protected, and the proposed area lies within approximately 27 miles of eight existing MPAs. CDFW concluded that, as proposed, the Chitqawi SMCA would not improve the design and ecological function of the existing MPA network under the SAT Science Guidelines.

There are also unanswered economic questions. CDFW states that, because of the scope, timeline, and data availability, it was unable to conduct an economic or fiscal impact analysis for the proposed MPA and that significant information remains outstanding. For a community like Morro Bay, with generations of commercial and recreational fishing history, those human dimensions matter. CDFW also reports that the proposed MPA overlaps an existing wastewater discharge. The Morro Bay Water Reclamation Facility is permitted to discharge treated municipal wastewater, saline waste, and reverse-osmosis concentrate through an outfall in the proposed area. The facility is authorized for a maximum daily effluent flow of 2.74 million gallons, and CDFW states that the facility would discharge wastewater directly into the proposed Chitqawi SMCA.

If we are going to restrict Indigenous people and local fishing families in the name of protecting an ecosystem, shouldn't we first understand the entire system we are trying to protect?

That question brings me back to Indigenous Knowledge. I am concerned when decisions about Indigenous ancestral territories depend heavily upon documents created through missions, government institutions, or later researchers. Those documents have value, and I use historical records in my own academic work. But they do not tell our entire story.

## **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

### **Proposed Chitqawi State Marine Conservation Area**

Our knowledge is also carried through language, oral histories, family teachings, archaeology, place names, gathering and fishing practices, ceremony, and the continued presence of Indigenous people on the landscape. Those forms of knowledge deserve a place at this table too.

That is why I was encouraged by CDFW's recommendation for an Alternative Pathway. Rather than simply establishing the proposed Chitqawi SMCA, CDFW recommends working with the Santa Ynez Band of Chumash Indians, other interested tribes, California State Parks, and the Department to explore designation of the area as a State Marine Cultural Preservation Area. CDFW explains that this alternative could recognize the cultural significance of Morro Rock and the surrounding area without limiting access for other tribes with historical connections to this place.

CDFW also recognizes that the Santa Ynez Band currently holds tribal take exemptions within four existing South Coast MPAs - Naples, Kashtayit, Point Dume, and Anacapa Island - and identifies those existing areas as opportunities to continue advancing meaningful co-management.

I support CDFW's Alternative Pathway. I ask, however, that the process be truly inclusive. Bring Salinan Tribal peoples with ancestral, cultural, linguistic, historical, and subsistence relationships to Morro Bay into that conversation. Bring Western science and Traditional Ecological Knowledge together. Consider archaeological and historical records, but also listen to language, oral histories, family knowledge, cultural practices, and generations of observation. These ways of knowing do not have to compete. Together they can provide a much fuller understanding of this place and how we should care for it.

I do not oppose marine conservation. I care deeply about conservation. I believe we can protect marine ecosystems without repeating a history in which Indigenous peoples are separated from their ancestral lands and waters through boundaries created by others. I therefore respectfully ask the Tribal Committee to support CDFW's Alternative Pathway rather than establishing the Chitqawi SMCA as currently proposed. I ask you to use this moment to create something better: something that recognizes the multiple Indigenous histories, knowledge systems, relationships, and responsibilities connected to Morro Bay and the Central Coast; something that understands that stewardship is not simply about who gets access to a resource. It is about responsibility to a place.

When future generations look back on this decision, I hope they see more than another protected area on a map. I hope they see a moment when California chose to protect not only the ocean but also the relationships that have always made this place whole.

Thank you for your time and for considering my comments.

Sincerely,  
**Jennifer Freeman**  
Salinan Tribal Member



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**F & Wildlife Commission + Tribal Commission Committee Alternate Plan from Salinan Tribe of Monterey and San Luis Obispo Counties**

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From bonnie pierce

Date Wed 09/23/2026 12:03 PM

To FGC <FGC@fgc.ca.gov>

Cc Salinan Tribe of Monterey and San Luis Obispo Counties <editor@salinantribe.com>; edsalinan [REDACTED]  
[REDACTED] Jennifer Freeman [REDACTED]

Please see the following attachments from the Salinan Tribe of Monterey and San Luis Obispo Counties Territory Project Team.

We will be in attendance at the October 2026 meeting and would like to ensure the following document package gets to both the Fish & Wildlife Commission and the Tribal Commission/Committee in advance.

*Edward Pierce, Territorial Lead, will have a video on the California Central Coast Salinan Territory/related to MPAs. This will be sent as a supplemental comment by October 8, 2026, according to the guideline received. As well as being present at the October meetings.*

Thank you for your consideration

**Ken Pierce**-Elder; Community Resource Business Seat Lead

**Edward Pierce**-Elder, Council Rep; Territory Lead (will be present)

**Bonnie Pierce-Elder**, Tribal Dept-Cultural Ed Lead (will be present)

**Jennifer Freeman**-Elder in training-Science view (will be present)



## Salinan Tribe of Monterey & San Luis Obispo Counties

Dept. of Fish & Wildlife Commission/Director's Office  
P.O. Box 9442, Sacramento, CA 94244-2090

Submitted via **email-fgc@fgc.ca.gov**

To whom it may concern,

Please find enclosed the Alternative Plan submitted by the Elder Council-Salinan Tribe of Monterey & San Luis Obispo Counties, noting 3 current MPAs within Salinan Territory. Also included are individual tribal member/family letters expressing concern about the 3 Petition MPAs below, particularly Petition 2023-19MPA of Sacred Le'sa'mo-Morro Rock.

**Petition 2023-19MPA:** Request from Santa Ynez Band of Chumash Indians (SYBCI) to designate a new MPA called "Chitqawi State Marine Conservation Area (SMCA)" in Morro Bay with a tribal take exemption for SYBCI

**Petition 2023-20MPA:** Request from SYBCI to change take regulations and add a tribal take exemption for SYBCI at Point Buchon SMCA, and expand Point Buchon State Marine Reserve northward

**Petition 2023-28MPA\_AM1:** Request from the Northern Chumash Tribal Council, as co-leads with the Natural Resources Defense Council, designate a new SMCA off Point Sal, in Santa Barbara County, with a tribal MPA name determined through tribal consultation

It is our hope that you consider how disastrous this action in our homeland would be to our Tribal families as well as to our local economy. You likely already know that the area in question is a fishing community, and many families would be financially impacted.

It is with great anticipation and gratitude that the Dept. of Fish and Wildlife Commission would consider this matter with open hearts for our local community and tribal families, as we are still here. Making this area our home and being the stewards of our land mean a great deal to our communities.

**Contact Persons** for the Fish & Wildlife Commission & Tribal Committee on all MPA's affecting Salinan Stewardship within the Salinan Tribe of Monterey & San Luis Obispo Counties:

**Edward Pierce-Elder Council/Tribal Council** contact on Territorial Matters [REDACTED] and/or

**Bonnie Pierce-Elder Council & Dept of Cultural Education;** [REDACTED]

Mail to 76725 Bryson/Hisperia Road, Bradley, California 93426.

Thank you for your attention regarding this matter.

Sincerely, Kenneth J. Pierce

[REDACTED]

Elder & Community Resource/Business Seat-Tribal Council of Salinan Tribe of Monterey & San Luis Obispo Counties

Tribal Office 8270 Morro Road, Atascadero, CA 93422  
Phone: 805-464-2650 Fax: 805-464-2651

### **MPA Alternate Management Plan- Salinan Tribe of Monterey & San Luis Obispo Counties**

Salinan People have been, and continue to be, the Stewards of Salinan Territory since the beginning of our existence on this planet—a gift from our Sacred First Mother-Earth. Reciprocal relationships, both material and spiritual, teach us that all “beings” are related through this shared source. Every interaction, whether between humans, animals, plants, air, water, or stone, helps keep balance within this reciprocal system.

Salinan people honor our Stewardship responsibility as a cyclical relationship of mutual responsibility between humans and the natural world. As Salinan Hunters/Fishers/Gatherers, we understand that to have an equal relationship, one must give back in some way—through care, protection, offerings, or other responsibilities—to maintain balance.

“Modern attempts” to define Stewardship tend to box this time-immemorial responsibility into a historical framework in which humans and Earth are treated as separate entities. Balance then becomes an individual, contractual, or legal exchange. Historically, Western Civilization operated from a different relationship with land and natural resources, including what has been described as a “Frontier Ethic,” where resources were consumed, and people moved on to new frontiers when those resources were depleted.

California Natural Resources Agency policies now recognize something Indigenous people have always understood: Tribal stewardship is connected to inherent sovereignty and responsibility for ancestral lands and waters. It is not simply about owning land or receiving permission to care for it. It comes from being in relationship with that land and carrying the responsibility to care for it.

T’epot’aha’l = “Salinan” people have carried the honor and responsibility as the original/rightful Stewards of Salinan Territory through time, understood and passed down through our Ancestors’ stories to our Elders and through our family lines. The confusion then lies in WHEN and WHY this began to be questioned. Why were those questions not brought directly to the Salinan people? Or is the use of the NAME “*Chumash*” becoming a way to change the long-held understanding that Salinan is the Steward of Salinan Territory?

Did Ancient/Ancestral lands, territories, food, and water sources create conflict between Tribal Stewards? As Salinan people, we understand the responsibility that comes with Stewardship of our ancestral lands and waters. That understanding also requires us to respect the ancestral territories and Stewardship responsibilities of neighboring Tribal peoples. We would not enter another Tribe’s territory and attempt to claim that place, rename it with our own Tribal identity, or change its cultural narrative to suggest that it belongs to us. We believe we should extend the same respect to Salinan people within Salinan ancestral territory.

Tribes may disagree, and histories and relationships between neighboring peoples can be complex. Salinan have successfully worked in partnership with the Santa Ynez Band of Chumash Indians (SYBCI), demonstrating that respecting territorial and cultural distinctions

Pierce, Bonnie  
Elder MPA Response-4 pages  
9-17-26

does not prevent collaboration. Rather, those distinctions can provide the foundation for respectful Tribal relationships. We understand that Tribes can disagree and still work together.

What Salinan people are asking is to lead the management with our cultural narrative, Stewardship, and decisions concerning MPAs that affect our ancestral land and ocean territory. This does not mean excluding neighboring people or refusing partnership. It means recognizing that partnership should begin with respect for the Indigenous people whose ancestral territory is being discussed.

Today's world is different. As once quoted, "*Survival is a blessing and a Curse.*" Too often today, survival and success are measured by material wealth and by how much power can be shown outwardly to others. Even when an elaborate ceremony takes place, Elder Wisdom might ask: *What will people remember after those who lead are gone? What did the event look like? What does it cost? Or will they remember how those leaders demonstrated Stewardship and created a shared experience?*

Reciprocal relationships were not always measured by monetary value. A set of clam shells made into a necklace might have been shared in exchange for a meal, if both agree they have an equal relationship. Today, a hand-made clam shell necklace for a meal shared in unity—which has more value? Elder Wisdom might answer: *It depends on what was agreed upon.*

That same question of value applies to how Indigenous history and knowledge are understood today. In California, public universities themselves were built on Native ancestral lands, yet Western academic research has often been relied upon to determine who the "original stewards" of those lands were. Non-Indigenous scholars interpreted cultures and languages they did not grow up within, sometimes using artifacts found along travel and trade routes to draw territorial conclusions. Where, then, is the equal value given to the knowledge carried through Indigenous oral histories, Ancestor Stories, Elders, and family lines?

Today, that imbalance is beginning to be challenged. Indigenous Oral knowledge and Traditional Ecological Knowledge are increasingly being recognized for their value. Salinan Elders' Ancestor Stories teach about balance. We are revitalizing those discussions around LAND/WATER ownership versus Stewardship. Mother Earth maintained balance long before humans were introduced upon her. Stewardship asks us not simply, "Who owns this?" but "Who carries the responsibility to care for it?"

Our Salinan people do not need to own every piece of our ancestral land or water in order to carry our responsibility to it. Salinan villages, families, and communities lived within and cared for this territory long before today's concepts of private property boundaries. That raises another question Elder Wisdom might ask: **Why should Salinan people now have to prove where we started from in order to steward the territory our Ancestors taught us to care for? What puzzles Salinan Elders even more is when other Indigenous tribal people use approaches without honoring the same principles of territorial respect.**

\*Why would the ancestral territory and Stewardship responsibility of the Native people of that place not come first?

\*Why should another Tribes NAME be placed upon an area without first working directly with the Indigenous people whose Elders identify that place as their ancestral territory?

\*Why is there not a stronger effort to support Indigenous management that begins with the Tribal people of the territory leading?

Subsistence-based tribes: modern subsistence values have maintained local communities; why then not allow our Salinan tribe of Monterey and San Luis Obispo Counties-historical stewards in our territory to lead the narrative and invite interested tribal neighbors, local subsistence people of today who live in those local communities within the territory? Include modern subsistence fishers, workers who live and support keeping the community strong-the fishers, waterfront, and the local governing body?

Salinan Elders have done our historical work, and we have taught our youngers. We understand the difference between private land ownership and public, community, and territorial Stewardship. Stewardship does not disappear because someone else holds deeds as individuals. Or because a government rules over a state, or an organization places different names upon a location based on legal rules. This is about coming together and refreshing our minds; those who have survived the longest may have knowledge that could help correct past mistakes. To explore the why, not for \$\$/power, but because none of Mother Earth's gifts were to be purchased but rather taken care of to keep the balance so those same resources are there in the future, equally shared by all.

**This is why Salinan Nation Elders within our ancestral territorial boundaries are suggesting an Alternate Plan for the MPAs affecting these lands and ocean waters.**

To help with this discussion, Elder Edward Pierce is willing to share his knowledge and video documentation. He was raised in Morro Bay and carries lived knowledge as a fisher, Abalone Diver, Hunter, Gatherer, Territorial Map Expert, and STMSLO Tribal Elder Representative. His knowledge can help explain the territorial relationships and balance that our tribe's Salinan Elders are asking the State of California to understand. Yet he must copyright his knowledge to hold his history sacred, or allow Western Civilization 'scholars' to take credit for discovering what has always been in history?

Our Salinan Tribe asks Salinan Elders and Tribal leaders to lead in representing the cultural narrative and Stewardship of MPAs within Salinan ancestral territory, while working in respectful partnership with others who also have relationships, knowledge, and responsibilities connected to these lands and waters.

**Proposed Alternate Plan**

After discussion with the California Fish and Game Commission Tribal Committee and the appropriate State of California agencies and governing bodies, Salinan Elders propose an Alternate Plan based upon Indigenous principles of Stewardship, Relationship, and Balance.

**FIRST:** As Territorial Stewards, our tribe takes the narrative lead; meeting directly with the Native peoples involved in these MPA proposals, including those using Chumash names and identities, and working toward consensus wherever possible using Indigenous principles.

**SECOND:** Include the people who live, work, and fish, who have subsistence gathering knowledge, and who have given back to their local community from what they earned from the ocean. Salinan people are not against those who came after our Original Native people. Stewardship does not mean that only Indigenous people have knowledge to contribute. Local fishermen, governing representatives, scientists, resource managers, community members, and others who have spent their lives along the Central Coast carry important experience and expertise. Newer generations have found their own relationship. Indigenous Stewardship can provide the foundation while allowing that local knowledge to be shared in a reciprocal relationship.

**THIRD:** Discuss **Balance**. Before creating another boundary, restriction, name, or management structure, ask: Where is the imbalance? What are we trying to restore? Is the problem simply too many people using a resource, or should we also examine how resources are consumed, developed, transported, managed? Are we treating only what we can see on the surface, or are we looking at the whole system? Sportsman vs. Subsistence? Rich \$\$ consumerism vs. community-based families that stayed local throughout history? Otters, seals, creatures on top of the waves vs. bottom-feeder ecosystems? Predator vs. prey?

Salinan Elder Wisdom teaches us to look deeper. Why do some species flourish while others disappear? What has changed in the water, on the ocean bottom, along the shoreline, and throughout the larger ecosystem? What happens when decisions about one species affect another? Hunters, Fishers, and Gatherers learn by watching those relationships over generations. Indigenous Knowledge does not separate one part from all the others. Landscapes have changed, but for the better?

Indigenous people have survived enormous changes to our lands, waters, food systems, and ways of life. Salinan people survived colonization, removal from lands, loss of access to traditional resources, and systems intended to replace our languages, beliefs, and ways of knowing. Yet our responsibility to our Territory did not disappear because control of the land changed hands.

***Salinan Elders ask: Has the way these lands and waters currently brought them into Balance? And if not, shouldn't the people who have carried responsibility for these places for generations help lead the work to restore Balance?***

Together, there are answers. Salinan people are not saying that we hold every answer. We are saying that the knowledge of our Elders, Hunters, Fishers, Gatherers, and families should not be treated as something secondary to knowledge brought from outside our Territory. Scientific knowledge, local knowledge, and Indigenous Knowledge can work together, but Indigenous Stewardship should not be invited in only after the boundaries, names, and management plans have already been decided.

**The Alternate Plan** offered within the Salinan Nation is for the Salinan Elders' Council and Tribal Council to lead Territorial Stewardship discussions concerning MPAs within Salinan ancestral territory, working in relationship with neighboring Tribal peoples, local fishermen, scientists, resource managers, local community leaders, and government representatives.

Start with the people within our tribe of Monterey and San Luis Obispo County- who have learned and understand what our **Elders call "fixing the balance."** Start locally. Start with relationships. Start with the people who know the land and water—not because they seek a large position or monetary gain, but because they carry a responsibility to care for these places for those here now and those yet to come.

***Thank you for this consideration***

***Elder Edward Pierce***-Judicial Branch/Elder Council Representative @76725 Bryson-Hisperia Rd, Bradley, CA 93426 and

***Elder Bonnie Pierce***; Cultural Education Dept – [REDACTED]

***Attachment list for our tribe's consideration for an Alternative Plan***

# **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

## **Proposed Chitqawi State Marine Conservation Area**

**Date:** September 20, 2026

**To:** California Fish and Game Commission Tribal Committee

**Re:** Petition 2023-19MPA\_AM1 - Proposed Chitqawi State Marine Conservation Area

Dear California Fish and Game Commission

My name is Jennifer Lee Freeman. I am a Salinan Tribal member, born and raised in Morro Bay. My family has a multi-generational history of hunting, fishing, gathering, and living along California's Central Coast, within Salinan traditional territory extending from the Santa Maria River north toward Big Sur. Drawing on my half-century of lived experience, informal and formal education, family history, and relationship with this place. I appreciate California's efforts to strengthen Tribal stewardship, consultation, and co-management. At the same time, Petition 2023-19MPA\_AM1 asks us to consider a larger question: What does it truly mean to protect a place? For Indigenous peoples, conservation has never meant protecting a single species or drawing a boundary on a map. The ocean, estuaries, creeks, mountains, plants, animals, people, and communities are part of an interconnected living system. Watersheds and ocean currents do not stop at jurisdictional boundaries, and fish do not recognize political boundaries.

My education about these relationships did not begin at the university. It began in Morro Bay. As a child, I explored tide pools, watched birds, flora, and fauna, fished, gathered, and observed how this place changed with the seasons. Long before I learned the academic term Traditional Ecological Knowledge (TEK), I learned through observation, participation, family teachings, and my relationship with this place. I recently completed my master's degree in Agricultural Education at Oregon State University and plan to continue my doctoral research focused on TEK and the natural resources within Salinan Tribal territory, including work with Salinan Elders. Higher education has given me dominant society's academic language to describe relationships our people have understood for generations. For my family, fishing and gathering from the ocean were never simply recreational activities. They are food, sharing, knowledge, stories, family, and part of who we are—past, present, and future. That is why I am deeply concerned about Petition 2023-19MPA\_AM1. As currently proposed, the Chitqawi State Marine Conservation Area would be no-take, except for a tribal take exemption for the Santa Ynez Band of Chumash Indians. I strongly support Tribal stewardship and meaningful Indigenous participation in managing ancestral lands and waters, but I do not believe that strengthening one Indigenous relationship should require excluding, restricting, diminishing, or erasing another.

CDFW's July 2026 evaluation identifies this concern. The Department states that consumptive activities within the proposed MPA would be prohibited for other federally and non-federally recognized tribes currently harvesting in this area. A federally recognized tribe could later petition for an exemption, but CDFW states that there is currently no pathway for non-federally recognized tribes to obtain one. That matters deeply to the Salinan people. For generations, Indigenous peoples in California have watched others draw boundaries across our homelands through missions, private property, and state and federal jurisdictions. Now we are discussing another boundary, this time in the ocean. I understand that contemporary resource management requires boundaries, but I ask the Committee to consider whether those boundaries should also determine which Indigenous relationships to a place are recognized and which are not. Traditional territories and relationships to place cannot be understood simply as lines on a map. When conservation begins only with those lines, we risk protecting habitat while overlooking the cultural landscape that has existed within it for thousands of years.

The proposed name also warrants careful consideration. Place names carry language, stories, history, identity, and relationships to land and water. Naming this protected area "Chitqawi" does more

## **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

### **Proposed Chitqawi State Marine Conservation Area**

than give a new MPA a title. If adopted by the State of California, that name becomes part of the official public representation of the Indigenous history of this place. Morro Bay is part of the Salinan people's ancestral and continuing cultural landscape. Our language, families, fishing traditions, and relationships with these waters are still here. If California is going to place an Indigenous name on a protected area in Morro Bay, the Salinan people need to be part of the conversation about what that area is called.

This also raises a broader question about how agencies determine Indigenous cultural connections to a specific place. When the State recognizes an Indigenous name, history, stewardship role, or special access associated with a particular geographic area, that recognition should be grounded in a careful, transparent understanding of cultural affiliation. This should include consideration of family and community histories, oral histories, language, documented ancestral connections, archaeological and historical records, traditional use, and ongoing relationships with the land and waters. No single form of evidence tells the whole story, but agencies have a responsibility to consider and validate these sources together before making decisions that may officially associate an Indigenous identity with a place.

This is especially important in areas where the histories and territories of neighboring Indigenous peoples may overlap or where different groups assert cultural connections. Requesting careful documentation is not about excluding other Indigenous peoples or questioning anyone's identity. It is about ensuring that State decisions accurately and respectfully reflect the Indigenous peoples who can demonstrate ancestral, cultural, familial, and historical ties to the place being named or managed. I support the Alternative Pathway. It offers an opportunity to bring together the Indigenous peoples connected to this place and to ask whose histories and languages are represented and how the name can reflect Indigenous relationships to this place.

The State's own evaluation also raises important scientific and management questions. CDFW found that the proposed Chitqawi SMCA falls short of the recommended size criterion and that the identified habitats are already well represented in the region. Most importantly, CDFW concluded that, as written, the proposal would not improve the design or ecological function of the existing MPA network under the SAT Science Guidelines.

Important economic questions remain. CDFW was unable to conduct an economic or fiscal impact analysis for the proposed MPA and states that significant information is still outstanding. For a community like Morro Bay, with generations of commercial and recreational fishing history, those human dimensions matter. CDFW also reports that the proposed MPA includes an existing permitted wastewater outfall from the Morro Bay Water Reclamation Facility, which discharges municipal wastewater and other waste into the proposed area. If agencies are going to restrict Indigenous people and local fishing families in the name of protecting an ecosystem, shouldn't we first understand the entire system we are trying to protect?

That question brings me back to Indigenous Knowledge. I am concerned when decisions about Indigenous ancestral territories rely heavily on documents produced by missions, government institutions, or later non-Indigenous researchers. These records have value, and I use historical and scientific sources in my academic work, but they represent only one piece of a much larger puzzle. They do not capture the much older knowledge carried by Indigenous people across generations. They do not tell our entire story. Our knowledge is also carried through language, oral histories, family teachings, archaeology, place names, gathering and fishing practices, ceremony, and the continued presence of Indigenous people on the landscape. These are not lesser forms of knowledge simply because they were not recorded in the same way or at the same time as Western scientific and historical documents. They are part of the knowledge needed to understand these places, and they deserve a place at this table, too.

## **PUBLIC COMMENT ON PETITION 2023-19MPA\_AM1**

### **Proposed Chitqawi State Marine Conservation Area**

That is why I was encouraged by CDFW's recommendation for an Alternative Pathway. Rather than simply establishing the proposed Chitqawi SMCA, CDFW recommends collaborating with the Santa Ynez Band of Chumash Indians, other interested tribes, California State Parks, and the Department to explore designating the area as a State Marine Cultural Preservation Area. CDFW explains that this alternative could recognize the cultural significance of Morro Rock and the surrounding area without limiting access for other tribes with historical ties to this place.

I support CDFW's Alternative Pathway. I ask, however, that the process be truly inclusive. As an Indigenous scholar who navigated the dominant society academic system, I am looking forward to working to bring voice to my tribal people who have stayed safe by remaining quiet to survive the traumatic genocide in California. Bring Salinan Tribal peoples with ancestral, cultural, linguistic, historical, and subsistence relationships to Morro Bay into that conversation. Bring Western science and Traditional Ecological Knowledge together. Consider archaeological and historical records, but also Elders' oral histories, family knowledge, cultural practices, and generations of observation. These ways of knowing do not have to compete. Together they can provide a much fuller understanding of this place and how we should care for it.

I do not oppose marine conservation. I care deeply about conservation. I believe we can protect marine ecosystems without repeating a history in which Indigenous peoples are separated from their ancestral lands and waters through boundaries created by others. Therefore, I respectfully ask the Tribal Committee to support CDFW's Alternative Pathway rather than establishing the Chitqawi SMCA as currently proposed. I ask you to use this moment to create something better: something that recognizes the multiple Indigenous histories, knowledge systems, relationships, and responsibilities connected to Morro Bay and the Central Coast; something that understands that stewardship is not simply about who gets access to a resource. It is about responsibility to a place.

When future generations look back on this decision, I hope they see more than another protected area on a map. I hope they see a moment when California chose to protect not only the ocean but also the Indigenous relationships that have always made this place whole.

Thank you for your time and for considering my comments.

Sincerely,

**Jennifer Lee Freeman**

Salinan Tribal Member – Elder in Training



TO: Dept. of Fish & Wildlife Commission; Director's Office  
P.O. Box 944209, Sacramento, CA 94244-2090

FROM: Salinan Tribe of Monterey and San Luis Obispo Counties

**SUBJECT: Attachment list for our tribe's consideration for an Alternative Plan  
As Salinan Territorial Stewardship along the Central Coast, California**

|                                                                                                                                                   |             |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Salinan Tribe of Monterey + San Luis Obispo Counties-Elder Ken Pierce                                                                             | 1 page      |
| MPA Alternate Management Plan-Cultural Education Dep-Elder B Pierce                                                                               | 4 pages     |
| Petition 2023-19MPA/Land/Ocean=Balance- Indigenous Science-J Freeman                                                                              | 3 pages     |
| Territory-Land & Ocean- <i>Taped Presentation</i> -Elder Rep-Ed Pierce<br>(in person @ October Fish & Wildlife Commission-input session/meetings) | 20 min tape |

Tribal General Members' personal letters-*Alternate Plan/Petition-2023-19MPA (SMCA) in Morro Bay, Petition 2023-20 MPA/ (SMCA); and Petition 2023-28MPA-AM1 (SMCA)*

- |                                                                 |         |
|-----------------------------------------------------------------|---------|
| 1. 8/11/26-Bonnie Pierce-Elder Council/Cultural Education Dept. | 3 pages |
| 2. 8/11/26-Yvonne Davis-8/11/Tribal Business Council            |         |
| 3. 8/4/26- Pamela Flood-Elder/Tribal Business Council           |         |
| 4. 8/6/26- Ken Pierce-Elder/Tribal Business Council             |         |
| 5. 9/7/26- Sharon Thomas-Elder/Tribal Business Council          |         |
| 6. 9/8/26- Glenna Lee Hayes-tribal member                       |         |
| 7. 9/8/26- Ken Pierce Jr-tribal member                          |         |
| 8. 9/8/26- Logan Pierce-tribal member                           |         |
| 9. 9/9/26- Melaine Pierce Ritchson-tribal member                |         |
| 10. 9/9/26- Terrie White-tribal member                          |         |
| 11. 9/10/26-Tawny L. Shores-tribal member                       |         |
| 12. 9/12/26-Tracie Mitchell-tribal member                       |         |
| 13. 9/22/26-Lorin Pierce-tribal member                          |         |

**Contact:** Bonnie Pierce/Elder-Cultural Education Dept;

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**Re: F & Wildlife Commission + Tribal Commission Committee Alternate Plan from Salinan Tribe of Monterey and San Luis Obispo Counties**

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From bonnie pierce

Date Thu 09/24/2026 10:39 AM

To FGC <FGC@fgc.ca.gov>

Cc Salinan Tribe of Monterey and San Luis Obispo Counties <editor@salinantribe.com>; edsalinan [REDACTED]  
[REDACTED] Jennifer Freeman [REDACTED]

Additionally please see attached folder of our Salinan Tribe of Monterey and San Luis Obispo Counties General Members opinion about the MPA's within our Territory-especially 2023 MPA-19 concerning Morro Bay and our Sacred Morro Rock.

Thank you,  
Bonnie Pierce-Elder-Territory Project

On Wednesday, September 23, 2026 at 12:02:33 PM PDT, bonnie pierce <skinnerstories@yahoo.com> wrote:

Please see the following attachments from the Salinan Tribe of Monterey and San Luis Obispo Counties Territory Project Team.

We will be in attendance at the October 2026 meeting and would like to ensure the following document package gets to both the Fish & Wildlife Commission and the Tribal Commission/Committee in advance.

*Edward Pierce, Territorial Lead, will have a video on the California Central Coast Salinan Territory/related to MPAs. This will be sent as a supplemental comment by October 8, 2026, according to the guideline received. As well as being present at the October meetings.*

Thank you for your consideration

**Ken Pierce**-Elder; Community Resource Business Seat Lead

**Edward Pierce**-Elder, Council Rep; Territory Lead (will be present)

**Bonnie Pierce-Elder**, Tribal Dept-Cultural Ed Lead (will be present)

**Jennifer Freeman**-Elder in training-Science view (will be present)

**Suzanne "DeeDee" Pierce Perry**



September 23, 2026

DEPARTMENT OF FISH AND WILDLIFE

Director's Office

P.O. Box 944209

Sacramento, CA. 94244

RE: Chitqawi MPA Management Plan in Salinan Territory

To Whom it May Concern,

I am an Elder with membership in The Salinan Tribe of Monterey and San Luis Obispo. I have lived with my family in Morro Bay since I was born. My father Ernest "Skinner" Pierce was born in Morro Bay. His mother before him was born in Pleyto, CA. also in Salinan Territory. She chose to live with her children the last 57 years of her life in Morro Bay. To say Morro Bay is and always has been a gathering/home place for Salinan people is an obvious conclusion. I knew no one from another tribal village (ie: Chumash, Esselen, Yokut) members growing up here. I don't mean to disparage their stories, I'm just confused where were they? Maybe they lived in Arroyo Grande or San Luis Obispo, but I don't recall any from Morro Bay.

My dad's older brothers pioneered the Abalone business in Morro Bay. Morro Bay was once the Abalone capital of the World. When my father was killed in one of the largest, at the time, landslides in California; April 1, 1983 at Sycamore Draw, Big Sur, CA. the local folks of Morro Bay erected a memorial to him on the Embarcadero. Our Pierce family knows the Coast! And the Coast knows us! We have been raised to steward the resources and to respect all lands, territories, food, and water sources.

Now I hear that the Santa Barbara village of Chumash from The Santa Ynez Band of Chumash Indians intend to claim land outside of their territory and use our State and Federal agencies to achieve this goal. This is not the way of our people! We should be sitting at the table for these discussions. Elders should be asked for their valuable

input. I have personally fished these waters, I have personally cleaned the fish, dug the clams, uptrimmed and pounded the abalone that came through the Morro Bay Harbor.

I personally collect the Bull Kelp washed on-shore and show my grandchildren how to properly dry the bulbs and create the rattles to use in our ceremonies. These are our cultural truths. The Santa Barbara tribes have their own coast to manage, let them stay in their villages.

Respectfully yours,

Suzanne "DeeDee" Pierce Perry

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Sincerely yours,

Urna Semper

September 8, 2026

Regarding the Proposed Chitqawi Marine Protected Area in Morro Bay,  
California

To whom this may concern:

I am the granddaughter of Walter Donald Pierce(Duke). It has come to my attention that our Salinan tribe and our sovereign rights are being assaulted.

We have been great stewards of our lands of the Central Coast of California for many generations and have done an amazing job. Now our stewardship is being threatened. This directly affects our territorial rights of wind, water, marine life and our cultural resources. These resources are trying to be taken over by the Chumash tribe.

We are not the Chumash tribe and will not sit back and let this happen.

We are the Salinan tribe and have pride in our on going stewardship. We have pride in mother earth and what she has had to offer us and believe in honoring her in every way possible by being good stewards of her. This is a direct violation of our territory, our Salinan tribe and our right to be a Salinan. I say absolutely not! We need to stand together and continue to keep our lands safe. This territory always has been and always will be Salinan.

Glenna Lee Hayes  
A Proud Salinan

September 8, 2026

Regarding the Proposed Chitqawi Marine Protected Area in Morro Bay, California

To Whom It May Concern:

My name is Kenneth James Pierce Jr., and I am the grandson of Walter Duke Pierce. I am proud to carry forward my grandfather's legacy and the history, traditions, and cultural heritage of our Salinan family.

For generations, my family has lived, fished, and gathered along California's Central Coast. These waters are more than a recreational area to us—they are an important part of our identity, history, livelihood, and connection to our ancestors. Many members of my family were commercial fishermen, and our traditions connected to these waters have been passed down through generations.

The proposed Chitqawi Marine Protected Area in Morro Bay would further restrict our tribal families' access to waters that have historically been part of Salinan territory. Allowing only the Chumash Tribe to fish within this area would disregard the history and presence of the Salinan people and would create another violation of our cultural and territorial rights.

As the grandson of Walter Duke Pierce, I respectfully oppose any Marine Protected Area in Morro Bay that would prevent Salinan tribal families from fishing in their ancestral waters. I also recognize the serious harm these restrictions could cause local commercial fishermen and the families who depend upon this industry.

I respectfully ask that the history, rights, and voices of the Salinan Tribe be fully recognized and considered before any decision is made. Our connection to these waters must be protected for our families and future generations.

Thank you for your time and attention to this important matter.

Respectfully,

Kenneth James Pierce Jr.

8-8-26

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To Whom It May Concern:

My Name is Kenneth Pierce, Council member and Tribal elder of the Salinan Tribe of Monterey and San Luis Obispo Counties. I was raised in our tribal territory and my family as far back as the 1600s, have fished these waters. The central coast has always been the home of our Salinan tribe. Native and commercial fishing is our lifestyle, many members of my family were commercial fishermen.

Through my lifetime there has been a slow encroachment of our territory! Our boundaries are from southern Monterey County south to the Santa Maria River and east to the Temblor Mountains.

The area of the proposed Chitqawi Marine Protected Area in Morro Bay, California is a direct assault and encroachment of our territory and our cultural lifestyle, as well as to the many commercial fishermen in this area that it would affect. Allowing only the CHUMASH to fish the area would be historically incorrect, and another violation against our Salinan Tribe and cultural territory.

I'm opposed to any Marine Protected Area proposed in Morro Bay, California that would close our territorial waters to fishing for our tribal families, as well as damaging the commercial fishing industry greatly.

Thank You for Your attention to this matter,

Kenneth J. Pierce



September 8, 2026

Regarding the Proposed Chitqawi Marine Protected Area in Morro Bay, California

To Whom It May Concern:

My name is Logan Isaac Pierce, and I am the great-grandson of Walter Duke Pierce. As a younger member of the Salinan family, I believe it is important to honor my ancestors by speaking up for the land, waters, and traditions that have shaped our family for generations.

Morro Bay and the surrounding Central Coast waters hold deep cultural and historical meaning for the Salinan people. My family's connection to this area reaches far beyond my own lifetime. Our ancestors lived near these waters, gathered food from them, and relied upon fishing to support their families. These traditions are an important part of the history that has been passed down to me.

I am concerned that the proposed Chitqawi Marine Protected Area could prevent Salinan families from continuing to fish in waters that are part of our ancestral territory. The history of the Salinan people must not be overlooked when decisions are made about who may access and fish in this area. Recognizing the rights of one tribe should not require ignoring the history or rights of another.

As the great-grandson of Walter Duke Pierce, I want future generations of my family to experience the same connection to these waters that our ancestors had. Once access to an important cultural area is lost, the traditions connected to it become much harder to preserve.

I respectfully request that decision-makers listen to the Salinan people, acknowledge our historical connection to Morro Bay, and protect our right to continue our fishing traditions. Please consider the lasting effect this proposal could have on our culture, our families, and future generations.

Thank you for considering my concerns and allowing my voice to be heard.

Respectfully,

Logan Isaac Pierce

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To whom this may concern;

I am Loren Tim Hayes a member of the Salinan Tribe of Monterey and San Luis Obispo Counties and also a grandson of Walter Donald (Duke) Pierce. It appears that our Salinan tribe and our sovereign rights are being assaulted. We have been great stewards of our lands of the Central Coast of California for many generations dating back to the 1600's.

Our boundaries are from southern Monterey County south to the Santa Maria River and east to the Temblor Mountains.

The area of the proposed Chitqawi Marine Protected Area in Morro Bay, California is a direct assault of our tribal territory. This would affect the lives of many commercial fishermen and many of our tribal family members. Only allowing the CHUMASH to fish this area would be another violation against our Salinan Tribe and cultural history!

We are the Salinan tribe and have pride in our ongoing stewardship.

I'm always opposed to any Marine Protected Area in Morro Bay, California that would affect our fishing waters for our tribal family members and commercial fishermen.

Thank you for your time,  
Loren Tim Hayes

September 9, 2026

Regarding the Proposed Chitqawi Marine Protected Area in Morro Bay, California

To Whom It May Concern:

My name is Melanie Pierce Ritcheson, Tribal Member of the Salinan Tribe of Monterey and San Luis Obispo Counties.

I write in strong opposition to the proposed Chitqawi Marine Protected Area in Morro Bay. As a Salinan Tribal member whose family has lived, fished, and maintained cultural ties to these waters for generations, I view this proposal as a direct threat to our continued presence, cultural practices, and historical rights within our ancestral homeland.

The Salinan people have occupied and utilized the Central Coast since time immemorial. Our traditional territory extends from southern Monterey County to the Santa Maria River and east to the Temblor Mountains. Morro Bay and its surrounding waters are part of that homeland. These waters are not simply a recreational resource; they are part of our cultural identity, subsistence practices, family traditions, and history.

For decades, tribal members have watched our rights, recognition, and access steadily diminished. The proposed Chitqawi Marine Protected Area continues that pattern. Restricting access to these waters would further erode the ability of Salinan families to fish, gather traditional resources, teach younger generations, and maintain practices that have existed long before state agencies, regulatory boards, or modern political boundaries were established.

I find it unacceptable that a proposal affecting Salinan ancestral waters could move forward in a manner that fails to fully recognize Salinan history, territory, and continued presence. Any action that grants special access or recognition to another tribe while excluding or limiting the rights of the Salinan people in our own ancestral waters raises serious concerns regarding historical accuracy, fairness, and equal treatment.

The impact extends beyond tribal concerns. Commercial fishing families throughout the region would also suffer significant economic harm. Many local fishermen have relied on these waters for generations. Policies that restrict access without adequately considering the people whose livelihoods depend upon these resources create unnecessary hardship for working families and local communities.

The State of California and all responsible agencies have an obligation to acknowledge that the Salinan people are not a historical footnote. We are still here. We continue to live within our ancestral homeland. We continue to practice our culture. We continue to maintain our connection to these waters. Any proposal that ignores those facts is fundamentally flawed.

Therefore, I strongly urge the responsible agencies to reject this proposal or substantially revise it to ensure that Salinan cultural practices, fishing access, historical rights, and tribal interests are fully protected. No final designation or implementation should occur until meaningful consultation with the Salinan Tribe has taken place and our concerns have been directly addressed.

The Salinan people should not be forced to stand by while additional restrictions are placed upon waters that have sustained our families for generations. Our history, our culture, and our continued presence in this region deserve recognition and respect—not further exclusion.

Sincerely,

Melanie Pierce Ritcheson  
Salinan Tribe Member

9-7-2026

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To Whom It May Concern:

My name is Sharon Montgomery Thomas, I am a direct descendant of Agata Maria, Salinan, born in year 1673. I have been on the council for twenty five + years of the Salinan Tribe of Monterey and San Luis Obispo Counties.

I was born at home in Morro Bay California in 1948. My family was a family of 9 children. My father made his living Abalone diving in hard hat gear. Most of his brothers dove for Abalone. My mom's brothers all dove also for Abalone. As my brothers got older they also worked in the Abalone business.

My mother and many other wives of divers would go down when the Abalone came in so they could uptrim and prepare the Abalone for sale.

As children, mom would gather us up to go to the rock to see if the guys and my dad were on their way in. My mom also filleted fish in the market.

I am opposed to the three proposed Marine Protected Areas.  
My grown children and their families and friends use our ocean lovingly.

Sincerely,

A rectangular grey box used to redact the signature of Sharon Montgomery Thomas.

September 10, 2026

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To Whom It May Concern:

My name is Tawny Shores and I am a member of the Salinan Tribe of Monterey and San Luis Obispo Counties. I was born and raised on the Central Coast of California, which has been home to the Salinan tribe for thousands of years. Many members of my family were, and still are, commercial fishermen. My grandfather was a commercial fisherman in Morro Bay and my grandmother was an elder of the Salinan Tribe. My grandfather, Richard Sylvester, was a second-generation commercial fisherman along with his father and brothers that fished out of Morro Bay and Avila. My great-grandfather Walter "Duke" Pierce was a direct descendent of the Salinan Tribe, and along with his brothers they owned the Pierce Brothers Abalone business in Morro Bay. Our recorded Salinan family line goes back as far as 1672, documented from mission records.

The area of the proposed Chitawai Marine Protected Area in Morro Bay, California is a direct encroachment of our territory and our cultural lifestyle. Allowing only the Chumash to fish in our territory would be historically incorrect and another violation against the Salinan tribe and our cultural territory.

I am opposed to any Marine Protected Area proposed in Morro Bay, California that would close our territorial waters to fishing for our tribal families, as well as devastating our local commercial fishing industry. Please listen to the local fishermen and natives of this land by denying these three proposed MPA's in San Luis Obispo County.

Thank you for your attention to this matter,

Tawny L. Shores

September 9, 2026

Regarding the proposed: Chitqawi Marine Protected Area proposed in Morro Bay, California

To Whom It May Concern:

My name is Terry White. I am a member of the Salinan Tribe of Monterey and San Luis Obispo Counties. I was born and raised in Morro Bay, California. My father was a commercial fisherman in Morro Bay and my mother was an elder of the Salinan Tribe. I grew up in Morro Bay in a commercial fishing family. My father was a second-generation commercial fisherman along with his father and brothers that fished out of Morro Bay and Avila. My grandfather Walter "Duke" Pierce was a direct descendent of the Salinan Tribe, and along with his brothers, he fished commercially. They owned the Pierce Brothers Abalone business in Morro Bay. Our written and recorded Salinan family line goes back as far as 1672 to Agata Maria, documented from mission records. Our family and tribal members continue to regularly fish out of Morro Bay today.

As a local community member I am opposed to any Marine Protected Area proposed in Morro Bay, California. I feel that this proposal is a direct encroachment of Salinan territory and that it would be a devastating hit to this community and the many livelihoods, families and tourists coming to enjoy this maritime town.

Thank you,



Terry White

September 12, 2026

Regarding the proposed Chitqawi Marine Protected Area proposed in Morro Bay, California

To whom it may concern

My name is Tracie Mitchell. I am a member of the Salinan Tribe of Monterey and San Luis Obispo Counties. I was born and raised in Morro Bay and a member of a large commercial fishing family, I appose the proposal of the marine protected area proposed in Morro Bay California. My father was a second generation commercial fisherman along with his brothers and his father and his brothers. They fished out of Morro Bay, Avila, and all along the coast going north and south. My mother was a Salinan elder and her father Walter "Duke" Pierce and his siblings were direct descendants of the Salinan Tribe as well as commercial fishermen. Our Salinan lineage can be traced back to Agustin Maria in 1672. The Pierce brothers owned Pierce Brothers Abalone in Morro Bay, CA., and our family and tribal members still fish regularly out of Morro Bay to this day.

I feel that the proposed Chitqawi marine protected area proposed for Morro Bay CA., is an encroachment of the Salinan territory. It also will devastate the livelihoods and families that use the ocean as their way of living.

Tracie Mitchell

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## Comment on proposed MPA in Morro Bay

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**From** Jake Odening

**Date** Thu 09/24/2026 04:19 PM

**To** FGC <FGC@fgc.ca.gov>

Dear Members of the Fish and Game Commission,  
I am writing to share my feedback regarding the proposed Chitqawi State Marine Conservation Area (SMCA) near Morro Bay.

I am a Los Osos Resident and recreational fisherman. I strongly support marine conservation and recognize the immense value Marine Protected Areas bring to coastal ecosystems—including habitat protection against destructive industrial practices and promoting healthier, resilient fisheries that spill over into neighboring waters. I also fully support collaborative ocean management models co-led by regional Native American tribes and state agencies.

However, I am deeply concerned about the aspect of the proposal that restricts recreational fishing for the general public while exempting tribal fishing access.

The shoreline in question—stretching from Morro Rock up toward Cayucos—is one of the most accessible and widely utilized coastal stretches along the Central Coast. It provides vital shore-based fishing access for local residents, visiting families, children, and adaptive anglers using specialized equipment. For many people, particularly those with limited mobility or resources, this easily reachable shore represents one of the few places to fish safely without needing a boat or expensive gear.

This particular stretch of beach holds special memories for my family. It's the place where I first learned to surf fish, and caught my PR surf perch. It's also where my daughter reeled in her first Surf perch at the age of 2 and where my Dad and I often go fishing together.

I respectfully ask that the Commission consider an alternative management framework—one that preserves tribal co-management and strengthens cultural and environmental protections while keeping shore-based recreational fishing accessible to all members of the public. Equitable public access to our shared shoreline is essential, and conservation policies should balance natural resource protection with community access.

Thank you for your time, leadership, and consideration of community feedback.  
Sincerely,

Jake Odening

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## Proposed MPAs off of San Luis Obispo County

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From Lori French

Date Fri 09/25/2026 03:10 PM

To FGC <FGC@fgc.ca.gov>

Cc Shuman, Craig [REDACTED] Eckerle, Jenn@CNRA  
<Jenn.Eckerle@resources.ca.gov>

Hello

I'm a commercial fishing wife of forty two years based out of Morro Bay. Over the years, I have experienced changes to the California commercial fishing fleet brought on by more and more regulations first hand. The Morro Bay and Port San Luis commercial fishing fleet are shells of what we were in the 1980's. Of all the fishermen in Morro Bay with sons, including our family, none of our boys have gone into fishing. Many tried and then got off the boats because fishing has become so unstable. Both our sons fished their way through college, as did our nephew. Our oldest was on the boat for about six years until 2019. The changes to the dungeness fishery was the straw that broke the camel's back and he got off the boat, went back to school to get his Masters. From boat to boat, the story is the same, instability is killing California fishing families. My point? The proposed Tribally led Marine Protected Areas are just another layer to put us out of business, except this time these proposed MPA's will have more serious ramifications to actually change the economics of the harbors closest to them.

Fast forward to early May 2026 when we first learned of the proposed MPA's. When something as important as closing off more of the fishing grounds, I'd like to think that the commercial fishermen were consulted. We weren't. It seems that no one in Morro Bay or Port San Luis, including our Mayor and Harbor Director had any knowledge of these proposals. Myself and another fishwife started telling everyone from our fellow fishermen to the Morro Bay City Staff to the Salinan Tribe to the media. This has become another job I really didn't need, but I took on because these proposed MPA's are just flat out wrong, morally and socioeconomically. Taking access to all and giving it to just a few will fan the flames of racism that in this day and age, we just don't need. I do understand the intent to bring in tribal voices into the management of our oceans, but this is not the correct path.

We don't need any more MPA's in our area. We have 29. At this point this is just an ocean grab. There are conflicting studies on the success of the existing MPAs. There have been no socio economic studies of the ports that are affected by the existing MPA's and closing the areas directly off of Morro Bay and Port San Luis will have drastic effects on the commercial fishing fleets. There is enough potential damage to put many of us out of business. You put us out of business then the entire waterfront infrastructure changes. Look at Southern California harbors.

The entire process hasn't seemed to follow the original MPA process. Indeed there has been no outreach to the stakeholders and no transparency. PCFFA has reached out and received no answers to our letters.

I've read several comments that contradict each other from Fish & Game and various councils about the effectiveness of the MPA's offsetting climate change. But by closing the closest fishing grounds, forcing the commercial fleet to travel farther to find new areas to fish, the fleet is using more diesel, thus increasing our carbon footprint and adding to climate change.

My list of reasons not to approve the Proposed Chitqawi, Pt. Buchon and Pt. Sal MPA's:

"Adding a new MPA in this region of the MPA Network would not fill a connectivity or habitat representation gap or provide ecosystem or connectivity benefits when assessed per the SAT Science Guidelines." Dept. F & W recommendation!!!!

Chitqawi and Pt. Buchon-These two are too close to the harbor entrance. This could seriously hamper the lifesaving dredging that occurs at the harbor entrance. Personally, our family fought for this dredging after my father in law lost his life on November 9th, 1987. Our oldest son was born the morning before. Since 1987, there have been no deaths due to the bar/harbor conditions due to the annual dredging of the harbor mouth. My concerns are where would the spoils be placed and from the maps the proposed Chitqawi would take in half of the harbor entrance. I'm concerned that the spoils removal farther from the harbor would increase the overall costs of the dredging which in turn may lead to the government to decide it's not worth the cost.

The areas of the proposed Chitqawi, Pt. Buchon and Pt. Sal are valuable fishing grounds for commercial and sport fleets. It should be noted that not all boats are required to have VMS, thus information supplied by others in their testimonies may not be correct. In 2026, the cards were once stacked for us and I would say 95% of our income has come from this area. The salmon were in this area and boats from all over came to fish our waters. (It was so great to see after three, very, very, very long closed seasons.)

Chitqawi encompasses a very busy beach in Morro Bay which is under the California State Park system. This is a Tourist beach and adding another layer of regulations will be confusing, some of which might contradict each other.

Potentially closing or adding to the existing closed areas will lead to fishing boats having to go further out of our home, thus leading to increased fossil fuel consumption and extra overhead on our family businesses that can ill afford additional costs. (Currently the red diesel with no road tax is \$8.00 at Morro Bay's only fuel dock. The price in town for diesel with road tax is \$8.49 for reference.)

The Chitqawi and Pt. Buchon MPA's do not fall within the Santa Ynez Band of Chumash Indians homeland. This area is homeland to the Salinan tribe and the proposal doesn't take that into consideration. I believe the SYBCI already has fishing rights in other MPA's in Santa Barbara County.

Pt. Sal -This area is already protected under the Chumash Heritage National Marine Sanctuary and will require not only a CEQA but also a NEPA evaluation. This area is used by Port San Luis and Morro Bay commercial fishermen. It has been stated that not much production has come from this fishing block, but it is still vitally important locally. The decrease in production from this block is a direct result of the changes to the commercial fishing fleet over the years. Block landing numbers do not tell the entire story.

The Dept. of Fish and Wildlife does not have the budget to patrol these additional MPA's. This has been brought up at various meetings.

In closing I would just like to reiterate that bringing the California tribes and their knowledge is important to the big story, but again this is not the way to make up for the wrongs of the past.

Sincerely,  
Lori French

F/V Langosta II

**Chaos Coordinator**

F/V Langosta II, French Avocados, Little Red Egg Co. and Fish Wife Life

***Lori Vaccaro French***



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## Comments on MPA Petitions 2023-19MPA & 2023-28MPA

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From Nathan Rosser

Date Mon 09/28/2026 04:38 PM

To FGC <FGC@fgc.ca.gov>

Dear Fish and Game Commissioners and all interested parties,

My name is Nathan Rosser. **I am a commercial nearshore and deeper nearshore fisherman out of Morro Bay** providing fish to the **domestic** 'live fish' market. I'm 39 years old, married, have 2 children, am the sole provider of my household, have worked in the fishing industry my whole life, am a UCSB graduate, and I also fish for sea urchins and sea cucumbers in Southern California. I am pro-adaptive management and pro-collaboration with fisheries scientists and have a history participating in various fishing organizations. I founded the California Sea Cucumber Divers' Association (a 501(c)3) with a grant from the Resource Legacy Fund, have served as a past chairman of the California Sea Urchin Commission, have worked with CA Sea Grant on multiple projects, and was an interviewee as part of the MPA Decadal review.

**I am asking you to oppose MPA petitions 2023-28MPA and 2023-19MPA (Point Sal and Morro Bay/Chitqawi). From what I have seen and read, the socioeconomic analysis behind these petitions is woefully inadequate.** These petitions would be hugely detrimental to the fisheries I participate in. The existing MPA network provides a more than adequate amount of resource protection as is, if anything, we should be opening areas up and not closing down even more. **Right now there is a nice balance in my fishery in that Morro Bay nearshore fisherman have Piedras Blancas to the north and Port San Luis fisherman have the Point Sal area to the south of their port.** Of course we share these waters but for the most part, each harbor's fishermen focus more on 'their' respective areas and this works out nicely for keeping competition spread evenly. Closing Point Sal would be a massive blow to Port San Luis fishermen and result in heavy spatial displacement and inevitable fishing compaction and increased pressure in the remaining open areas. It would also force fishermen to travel further, burn more fuel, and take on more risk to fish more often in areas further from port. Seems ironic being in CA particularly, where the state as a whole is trying to go 'green/renewable energy' and 'eat local' that we would choose to undermine the very people (fishermen) working to do this. **Most importantly, this petition would be very harmful socioeconomically to Central coast fishermen and these effects have not been studied and analyzed nearly enough to make the decision to close Point Sal.** I would also like to state, having fished Point Sal extensively, it is extremely rich, abundant, and healthy with vast amounts of rockfish. It is very easy to catch fish there. It doesn't need additional protection so that a small special interest group can subsistence fish. There are copious amounts of large, healthy fish to go around down there

and the Chumash do not need a ban on commercial fishing to catch fish there. Anyone who fishes this area knows how incredibly productive the fishery is and how unnecessary additional protection is.

Regarding **the petition to close the closest available reefs to Morro Bay Harbor** via the Chitqawi petition, I would like to emphasize that our existing regulations and framework provide a very good level of protection to the resource there. Closing this area would be a huge blow to both commercial and recreational fishermen. It is often the only place you can fish when the weather is bad (which is often). It is a popular area, and I almost always see very small recreational watercraft (rowboats, kayaks, etc) fishing there. Closing it would shut out a lot of Californians from fishing access and be bad for the local economy as well. It is also where a lot of migratory fish species show up and the fishing can be phenomenal for white seabass and salmon at various times throughout the year. It would really be a sad thing to take the historic heart of the Morro Bay fishing community and effectively close it off for the benefit of very few (the Chumash). **I'm all for the Chumash having tribal rights to fishing access but it should be allowed in existing MPAs**, not designating wholly new additional ones solely for their minority group. It reeks of political backroom dealing.

As a father and a fisherman who has done his best to be a 'part of the process' and to work with fisheries scientists and managers, I am really disappointed that I have to continually fight to keep our already limited fishing areas open and the conversation is strictly about how many more MPAs can be enacted and not about the monitoring or opening up of some of our existing ones. It really reinforces how lopsided being on the commercial side of fishing feels when you consistently put your best foot forward and bring honesty and optimism to the table and try to work to enhance your fisheries only to have to plead your case against these draconian, top-down approaches to close massive spatial areas which are touted as the only means of resource conservation. It is disheartening and frankly, insulting, to the supposed 'adaptive management' that California loves to tout. I finally understand while the 'old-time' commercial fishermen feel so jaded and are often so secretive. It feels like the state is bulldozing over us fishermen, and I do believe that was **not the intention of the original Marine Life Protection Act when it was put into law.**

Thank you for your time.

*Nathan Rosser*

Law-abiding commercial fisherman 

Spends \$3300+ every year in commercial fishing licenses that goes up 5% annually

Feeds fresh sustainable seafood to Californians

Contributes tens of thousands of dollars to the local economy every year

Operates alone from a 20' panga boat the 'F/V Jolly Rancher' with a small fuel-efficient outboard

Is shutting me and a dozen other guys like me out of Point Sal and Morro Bay 'fisheries management'?

Please, reconsider.



# XOLON SALINAN TRIBE



“People of the Oaks”

Council:

Council Chair- Karen R. White, Vice Chair- Johnny Eddy Jr., Secretary-Treasurer, Melinda (Jill) Morris  
Council Members: Penny Pierce-Hurt- Elder, Zach White, Tim Bernal-Apodaca, Laura Oldroyd

**September 28, 2026**

**To: California Fish and Game Commission – California Dept. of Fish and Wildlife, Marine Region**

**Re: Santa Ynez Band of Chumash Indians – “Petition 2023-19MPA\_AM1-Chitqawi SMCA”**

Good day Commissioners,

On behalf of the Xolon Salinan Tribal Council, we are grateful for Melissa Miller-Henson and Ca. State Fish and Wildlife, spending the time with us during consultation, on September 18<sup>th</sup>. This gave us further insight and guidance, pertaining to the processes that must take place during this proposed petition overview.

We do not agree nor are we in favor of this petition proposal for an additional marine protect area (MPA.) Since there already exist a substantial MPA Network in place within this coastline. There are several concerns pertaining to the narrative of this petition. Let’s review the obvious.

This potential petition has the power to partially shut down a fishing industry that has lasted for over 120 years within the Morro aka Salinan traditional name Les’a’m. This petition will create an adverse domino effect of shutting down other businesses within the Morro region, connected to the fishing industry and will become detrimental to the community.

This potential MPA, blatantly disregards a multitude of families that depend on this industry for their primary income. This is a selfish and an irresponsible move on behalf of Santa Ynez Chumash Band. Including further confusion and complicated public regulations that would need to be in place.

We feel the State of CA. Fish and Game Commission has done a remarkable job of caring for our ancient oceans, in addition so many other State partners that care as well. The importance of sustainable fishing and harvesting must always be at the forefront. We understand these delicate eco-systems within these waters are extremely vulnerable at this time, due to climate change and a variety of other challenges. When one delicate system fails it creates a ripple effect.

Our ancestors were the first conservationist of these coastlines and our ancestral homelands as well. Our oral history tells us stories of our ancient elders banning some of our deer hunters from the tribe for killing to many deer during a season. They knew the importance of only taking what was needed, giving thanks for the sacrifice and ensuring sustainable seasons for the future.

Let us share a little about who we are. We are a People that prefers to be obscured within public view, this goes down through many generations of inequity, from land take-overs, discrimination and a variety of social injustice. However, when we see an act of prejudice that this potential petition has for everyone in

Xolon Salinan Tribe | P.O. Box 7045, Spreckels, CA 93962 | 831.455.1012

[xolon@salinan.org](mailto:xolon@salinan.org)

[www.xolonsalinantribe.org](http://www.xolonsalinantribe.org)

# XOLON SALINAN TRIBE



“People of the Oaks”

## Council:

**Council Chair- Karen R. White, Vice Chair- Johnny Eddy Jr., Secretary-Treasurer, Melinda (Jill) Morris**

**Council Members: Penny Pierce-Hurt- Elder, Zach White, Tim Bernal-Apodaca, Laura Oldroyd**

this community, no matter culturally affiliated or not, we must stand together and voice our concerns.

Since time immemorial, Les’a’m has stood as the southernmost sacred coastal landmark within the Xolon Salinan Tribal cultural landscape. The Salinan ancestors occupied seasonal coastal, hillside, canyon settlements and freshwater streams along the Central Coast.

Les’a’m is the location where a Salinan battle took place with a neighboring tribe approaching from the south, recorded by Juan Crespi, OFM of the Portola Overland Expedition in 1770. Spanish settlements in California Salinan lands, include Mission San Luis Obispo, Mission San Antonio, Mission San Miguel and the Asistencia’s of Santa Margarita and San Simeon.

We have documented our Xolon Salinan lineage on several of our Salinan families connecting to these coastlines for over 150 years. Over three hundred years, we have survived three land take overs. 10,000 + years, the ancient spirit and blood of our ancestors continue to run deep within the lands and oceans of these sacred landscapes.

This brings us to the name being proposed for this MPA, “Chitqawi” aka mission record village site name as “Chotcagua”. It is impossible to pin point a village site location within the mission records. The ancestors only gave a vague direction or a name of where they had come from. However, within this potential MPA, and over many years, there are over dozen cultural site records and another dozen studies that have been performed within this shoreline and close proximity land. These types of studies, can determined if this area did have the evidence of a village site, depending on the type of cultural resources reviewed, taken or observed.

In addition, if you read studies from past academics, this village site has been stated as Salinan and has been reinterpreted as Chumash. During the 1970-80’s, academics of this time period have created a detriment to the Salinan territories and boundaries of this region, due to poor study interpretations.

We are in favor of alternative pathways forward, to ensure the true ancient people will always have a proper voice within these coastlines. As we know, there are only two true ancient people that connect to these oceans & lands, the Salinan People and the Obispeno Chumash (YTT-Northern Chumash Tribe.)

Xa’ya-Ts’apa:ni (Thank you) for listening to our voices, we appreciate your time.

*Karen R. White, Council Chair and the Xolon Salinan Tribal Council*



Xolon Salinan Tribe | P.O. Box 7045, Spreckels, CA 93962 | 831.455.1012

[xolon@salinan.org](mailto:xolon@salinan.org)

[www.xolonsalinantribe.org](http://www.xolonsalinantribe.org)



Outlook

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**RE item number 31. Petition 2023-19MPA\_AM1**

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**From** VENTURA COUNTY COMMERCIAL FISHERMEN'S ASSOCIATION [REDACTED]

**Date** Wed 09/30/2026 09:11 AM

**To** FGC <FGC@fgc.ca.gov>

RE item number 31. Petition 2023-19MPA\_AM1 (New Chitqawi SMCA near Morro Bay, Tribally Led)  
Request to designate a new MPA near Morro Bay as "Chitqawi SMCA" that only includes a tribal take exemption for the Santa Ynez Band of Chumash Indians.

This is a letter VCCFA would like submitted to the record and evaluated prior to the meeting.

Thank you

Dave Colker

--

Dave Colker,  
Executive Director

[Ventura County Commercial Fishermen's Association](#)  
[REDACTED]



Ventura County Commercial Fishermen's Association  
1237 S. Victoria Ave #284  
Oxnard, CA 93035



September 30, 2026

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

**RE: Opposition to Petition 2023-19MPA\_AM1 – Proposed Chitqawi State Marine Conservation Area**

Dear President Sklar and Commissioners:

The Ventura County Commercial Fishermen's Association (VCCFA) previously submitted written opposition to Petition 2023-19MPA, which proposes establishment of a new Chitqawi State Marine Conservation Area (SMCA) near Morro Bay. Following review of the amended petition and subsequent information developed during the Commission's review process, VCCFA continues to oppose establishment of the proposed new MPA.

VCCFA recognizes and respects the cultural importance of the marine environment to the Santa Ynez Band of Chumash Indians and supports meaningful Tribal participation, stewardship, and collaboration in California marine-resource management.

Our opposition is not to Tribal stewardship or Tribal participation. Our concern is the proposed removal of additional fishing access through creation of a new MPA without a sufficiently complete assessment of the reasonably foreseeable socioeconomic and spatial-displacement consequences.

VCCFA raised this concern in our April 21, 2026 written comment. We specifically identified the need to evaluate how fishing effort presently occurring within the proposed Chitqawi SMCA would be redistributed into surrounding open fishing grounds and what consequences that redistribution could have for fishermen, receiving fishing grounds, and the regional fishing economy.

Those concerns remain.

Creation of a new MPA does not eliminate the fishing activity that presently occurs within the proposed boundaries. Some portion of that activity may instead relocate to other accessible fishing grounds. In this region, those receiving areas may include waters around Morro Bay and Cambria, Point Buchon and surrounding waters, and other productive Central Coast fishing grounds.

The relevant question therefore extends beyond what resources may receive additional

protection inside the proposed Chitqawi SMCA.

### **Where will the displaced fishing effort go?**

And equally important:

### **What happens to the remaining open fishing grounds when that displaced effort arrives?**

Before creating a new MPA and removing existing fishing access, VCCFA believes the Commission should have sufficient information to evaluate how much commercial and recreational fishing activity presently occurs within the proposed closure, how much of that activity is reasonably expected to be displaced, where that activity is likely to relocate, how much fishing effort already occurs within likely receiving areas, and what ecological, economic, operational, and fisheries-management consequences may result from concentrating additional effort there.

The original petition itself recognizes existing commercial and recreational fishing activity within the proposed area. VCCFA believes that identifying those uses is only the beginning of the necessary analysis. The Commission should also understand what happens to those users and to the surrounding fishing grounds after access is removed.

This concern is particularly important because Chitqawi would constitute a **new MPA**, rather than an adjustment to fishing regulations within an existing protected area. Establishment of a new protected area permanently changes the spatial availability of fishing territory and can create consequences extending beyond the boundaries drawn on the map.

VCCFA is also concerned about cumulative spatial pressures upon commercial fishermen. The Central Coast is increasingly affected by multiple competing ocean uses and spatial restrictions. The original Chitqawi petition itself references offshore wind development in the broader Morro Bay region. The effect of an additional MPA therefore should not be considered solely in isolation. The Commission should consider whether remaining accessible and productive fishing grounds can reasonably accommodate displaced activity while continuing to support existing fisheries and fishing communities.

VCCFA also believes the historical design of the existing Central Coast MPA Network deserves careful consideration before additional protected areas are established. The original MPA planning process involved extensive evaluation of ecological objectives, fishing access, socioeconomic impacts, and the distribution of fishing effort. Creation of an additional MPA through the present adaptive-management process should therefore be supported by a sufficiently complete record demonstrating both the need for the new closure and its reasonably foreseeable consequences.

The fact that this petition is Tribally led does not diminish the importance of those questions. VCCFA believes all proposals that would remove fishing access should be evaluated using consistent and sufficiently rigorous ecological, socioeconomic, and spatial-displacement standards, regardless of the identity of the petitioner.

Respect for Tribal knowledge, stewardship, history, and contemporary use is fully compatible with requiring a complete assessment of the consequences of creating a new MPA.

The absence of adequate displacement analysis does not establish that displacement consequences will be insignificant. It means those consequences have not yet been adequately

evaluated.

For these reasons, VCCFA continues to oppose Petition 2023-19MPA\_AM1 and respectfully requests that the Commission **deny establishment of the proposed Chitqawi State Marine Conservation Area unless and until the record provides sufficiently meaningful socioeconomic, economic, and spatial-displacement analysis to evaluate the reasonably foreseeable consequences of removing this fishing access.**

VCCFA incorporates and attaches its September 30, 2026 General Written Comment Regarding 2023 Marine Protected Area Petitions. That comment further explains VCCFA's concerns regarding socioeconomic analysis, spatial displacement of fishing effort, impacts upon remaining open fishing grounds, cumulative spatial pressures, Tribal engagement, working-waterfront economic consequences, and the need for a sufficiently complete record before additional fishing access is removed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Colker', with a stylized, cursive script.

Dave Colker  
Executive Director  
Ventura County Commercial Fishermen's Association (VCCFA)

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**Comment: Marine Protected Area (MPA) Regulation Change Petitions**

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From Chris Munson [REDACTED]

Date Wed 09/30/2026 02:56 PM

To FGC <FGC@fgc.ca.gov>

Cc John Craig [REDACTED]

Dear President Sklar and CA Fish and Game Commissioners.

We would like to place the City of Morro Bay's position regarding Marine Protected Area petitions 2023-19MPA, 2023-20MPA, and 2023-29MPA into the record.

On **August 11, 2026, the Morro Bay City Council unanimously voted 5–0** to authorize the Mayor to submit a letter opposing Petition 2023-19MPA and requesting deferral of Petitions 2023-20MPA and 2023-29MPA pending meaningful consultation with the City and local fishing stakeholders (attached).

The City's concerns are based on several issues. Morro Bay was not originally included in the consultation or outreach process, despite being a directly affected coastal community. The proposed Chitqawi SMCA is immediately adjacent to the entrance of Morro Bay Harbor, right where our recreational and commercial fisherman fish and our only stretch of public beaches. This raises concerns regarding navigation, harbor access, commercial fishing, and vessel and gear conflicts.

The City also requested additional analysis of the socioeconomic and cumulative impacts of the proposed MPA changes on Central Coast fishing communities. The staff report notes that CDFW had not completed a supplemental economic or fiscal analysis and that Commission staff lacked sufficient information to determine impacts on specific coastal fishing communities.

The City supports responsible stewardship of marine resources and recognizes the cultural and historical connections of California Native American tribes to these waters. At the same time, the City believes that the safety, economic vitality, harbor operations, and fishing interests of affected coastal communities should be fully considered.

The City Council's position was formally adopted **unanimously, 5–0, on August 11, 2026**.

Thank you.

**Chris Munson**  
*Harbor Director*  
*City of Morro Bay*  
(805)772-6255



## CITY OF MORRO BAY

### CITY HALL

595 Harbor Street  
Morro Bay, CA 93442

August 11, 2026

Meghan Hertel, Director  
California Department of Fish and Wildlife  
1416 Ninth Street, 12th Floor  
Sacramento, California 95814

Eric Sklar, President  
California Fish and Game Commission  
715 P Street, 16th Floor  
Sacramento, California 95814

Re: City of Morro Bay Opposition to Marine Protected Area Petitions 2023-19MPA, 2023-20MPA, and 2023-29MPA — Request for Denial or Deferral Pending Local Consultation

Dear Director Hertel and President Sklar,

On behalf of the Morro Bay City Council, we write in strong opposition to the proposed regulatory changes set forth in Marine Protected Area petitions 2023-19MPA (Chitqawi SMCA), 2023-20MPA (Point Buchon), and 2023-29MPA (Mishopshno SMCA), which are scheduled for consideration at the California Fish and Game Commission (CFGF) Tribal Committee meeting on August 11, 2026, and the full Commission meeting on August 12–13, 2026. We respectfully urge the Commission to deny or defer action on these petitions until a meaningful and legally adequate process of consultation with the City of Morro Bay and other directly affected local stakeholders has been completed.

### **I. Background: Morro Bay's Stake in These Proceedings**

Morro Bay is a small coastal city of approximately 10,000 residents in San Luis Obispo County, anchored by one of the Central Coast's most productive commercial and recreational fishing harbors. The Morro Bay commercial fishing fleet—which targets Dungeness crab, rock crab, sablefish, rockfish, salmon, and other species—operates in the very waters at issue in these petitions. Our harbor supports local fish processing operations, charter boat services, recreational fishing, whale watching, kayaking, and an active marine tourism economy that is central to the fiscal health and identity of our community.

Petition 2023-19MPA proposes to designate a new State Marine Conservation Area (SMCA) to be named "Chitqawi" in waters directly adjacent to Morro Bay Harbor, immediately offshore of Morro Rock—at the entrance to our harbor. Petition 2023-20MPA proposes significant changes to the Point Buchon SMCA and State Marine Reserve (SMR) located approximately eight miles south of Morro Bay, within routine fishing range of our local fleet. Petition 2023-29MPA proposes a new SMCA near Carpinteria named "Mishopshno," which, while geographically more distant, is co-petitioned by parties whose broader network of petitions affects the fisheries on which Morro Bay depends.

## **II. The City Was Never Consulted and the Process Has Been Legally Deficient**

Fish and Game Code section 2853 requires that any process for the establishment, modification, or abolishment of MPAs must involve "all interested parties, including, but not limited to, individuals from the sport and commercial fishing industries, aquaculture industries, coastal and ocean tourism and recreation industries, marine conservation organizations, local governments, marine scientists, and the public." Fish and Game Code section 2855 further requires that the California Department of Fish and Wildlife (CDFW) "take into account relevant information including, but not limited to, the socioeconomic and environmental impacts of various alternatives" when siting new MPAs or making major modifications to existing ones.

The City of Morro Bay was not notified of, consulted regarding, or invited to participate in any stage of the evaluation process for petitions 2023-19MPA, 2023-20MPA, or 2023-29MPA. We were not included in any of the regional public meetings held in April and May 2026. We were not identified as an affected local government in CDFW's evaluations. We received no advance notice of the July 30, 2026 release of CDFW's tribally-led petition evaluations, and we had fewer than 14 days between that release and the August 11, 2026 Tribal Committee meeting.

CDFW's own July 2026 Companion Document acknowledges that "CDFW did not have the ability to provide a supplemental analysis of the economic or fiscal impacts" for petitions, and that the evaluations "do not include an assessment of any socioeconomic benefits or impacts beyond impacts to commercial and recreational fisheries." CFGC staff similarly conceded in July 2026 that they were "unable to make determinations about whether, or to what extent, any specific petition advances or conflicts with the goals of" CFGC's own Coastal Fishing Communities Policy—adopted specifically to protect communities like Morro Bay—because "CFGC does not yet have detailed economic, demographic, or cultural data" to assess impacts on specific communities. This is an admission that the evaluations fall short of the statutory standard imposed by Fish and Game Code section 2855.

### **III. Specific Objections by Petition**

#### **A. Petition 2023-19MPA: Proposed Chitqawi SMCA near Morro Rock**

The City of Morro Bay opposes the designation of the proposed Chitqawi SMCA. The proposed SMCA would be located immediately adjacent to the entrance of Morro Bay Harbor—one of the most actively used commercial and recreational fishing ports on the Central Coast. The Ocean Protection Council (OPC), in its own July 31, 2026 recommendations to CFGC, recommended denial of petition 2023-19MPA, explicitly noting that "the proposed SMCA would be located immediately adjacent to Morro Bay Harbor, a critical regional port, potentially presenting significant challenges." The City concurs strongly with this assessment.

Morro Rock and the waters surrounding it are the gateway to our harbor. Any restriction on navigation, fishing access, or vessel operations in this area would have direct and potentially severe consequences for our commercial fishing fleet, charter vessel operators, harbor maintenance vessels, and recreational users. Beyond the operational impacts, a new MPA at this location could interfere with port safety and create dangerous ambiguities in an area with active vessel traffic, including vessels entering and exiting the harbor channel.

We further note that CDFW's own evaluation framework requires new MPAs to meet minimum size guidelines (at least 9 square miles) and high levels of protection to contribute meaningfully to the MPA Network. The proposed Chitqawi SMCA, as presented, would not meet these thresholds and—as OPC noted—may be an "irregular fit" for the tribal co-management goals it seeks to achieve. Those goals deserve to be pursued through alternative, non-regulatory pathways that do not impose navigational and economic burdens on Morro Bay.

The City of Morro Bay urges the Commission to deny petition 2023-19MPA.

#### **B. Petition 2023-20MPA: Point Buchon SMCA and SMR Modifications**

The Point Buchon SMCA and SMR are located approximately eight miles south of Morro Bay in San Luis Obispo County. Morro Bay fishermen regularly access these waters, and our harbor is the nearest commercial port. Petition 2023-20MPA proposes to (1) add a tribal take exemption for the Santa Ynez Band of Chumash Indians (SYBCI), (2) rename the SMCA to reflect Chumash cultural heritage, and (3) adjust the northern boundary of the Point Buchon SMR.

While the City of Morro Bay recognizes and respects the deep cultural and historical ties of the Chumash people to these waters, we object to the process by which this petition has proceeded without local government notification or input. At minimum, the City requests that before any action is taken on this petition, CDFW conduct formal consultation with the Morro Bay Harbor Department and our commercial fishing community regarding the operational implications of a

tribal take exemption and boundary changes on fishing access and gear conflicts in waters near the Point Buchon area.

We also express concern regarding the proposed northern boundary expansion of the Point Buchon SMR. The OPC itself recommended denial of this boundary change, noting it could cause "confusion and enforcement challenges" and result in a misalignment of the boundaries of Point Buchon SMR and SMCA. The City agrees. Boundary changes to fully protected State Marine Reserves require particularly strong justification and should not proceed without thorough analysis of impacts on nearby coastal fishing communities—analysis that CFGC staff has acknowledged has not been completed.

The City of Morro Bay urges the Commission to defer action on petition 2023-20MPA pending meaningful consultation with the Morro Bay Harbor Department and local fishing industry, and to deny the proposed northern boundary change to the Point Buchon SMR.

#### **C. Petition 2023-29MPA: Proposed Mishopshno SMCA near Carpinteria**

Petition 2023-29MPA proposes a new SMCA near Carpinteria, co-petitioned by the Santa Ynez Band of Chumash Indians, the Natural Resources Defense Council, and the Environmental Defense Center. While this area is geographically distant from Morro Bay, we note that the petitioners driving this and the other tribally-led petitions are simultaneously seeking to encumber the fishing grounds of Central Coast fishermen who operate from Morro Bay across the broader Santa Barbara Channel and Central Coast bioregion.

The cumulative impact of multiple new and modified MPAs in this bioregion—particularly when layered onto existing MPAs, the newly designated Chumash Heritage National Marine Sanctuary, and ongoing Vandenberg-adjacent restrictions—has not been assessed in a way that adequately captures the compounding effect on the livelihoods of Central Coast fishing families. CDFW's own evaluations acknowledge the absence of cumulative socioeconomic analysis. Approving petition 2023-29MPA without that analysis, and without meaningful engagement with the communities most affected, is inconsistent with both the letter and spirit of Fish and Game Code sections 2853 and 2855.

The City of Morro Bay urges the Commission to defer action on petition 2023-29MPA pending a cumulative socioeconomic impact analysis that includes Central Coast fishing communities, including those operating from the Port of Morro Bay.

#### **IV. Requests**

The Morro Bay City Council respectfully requests that the California Fish and Game Commission:

1. Deny petition 2023-19MPA in its entirety, consistent with the recommendation of the Ocean Protection Council, given its proximity to the entrance of Morro Bay Harbor and the significant operational and safety challenges a new SMCA in that location would create.
2. Defer action on petitions 2023-20MPA and 2023-29MPA until CDFW has completed the socioeconomic impact analysis required by Fish and Game Code section 2855, and until the City of Morro Bay, the Morro Bay Harbor Department, and representatives of the Morro Bay commercial fishing fleet have had a meaningful opportunity to consult with CDFW and appear before the Commission.
3. Formally add the City of Morro Bay and the Morro Bay Harbor Department to the notification and outreach list for all future proceedings related to marine protected areas in the Central Coast bioregion, including any subsequent rulemaking proceedings arising from these petitions.
4. Direct CDFW to schedule a dedicated consultation with City of Morro Bay officials and harbor stakeholders prior to any further action on petitions affecting the Central Coast bioregion, consistent with the requirements of Fish and Game Code section 2853.

The City of Morro Bay supports responsible stewardship of California's coastal and marine resources. We respect the rights and cultural connections of California Native American tribes to the ocean and to the resources that have sustained their communities since time immemorial. We recognize the importance of the Marine Life Protection Act's goals and the significant conservation achievements of the MPA Network. These values, however, must be balanced with the equally important mandate to protect the livelihoods, safety, and economic vitality of the coastal communities that depend on access to these same waters—communities that were not consulted in this process and who have much at stake in its outcome.

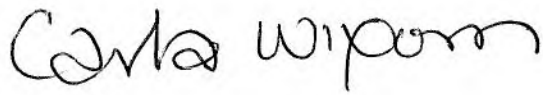
We are prepared to engage constructively with CDFW, CFGC, and with the Santa Ynez Band of Chumash Indians to find approaches that honor Chumash cultural heritage while protecting the operational integrity of Morro Bay Harbor and the well-being of our fishing community. We ask only that we be given the opportunity to do so.

Please direct correspondence to the Office of the City Manager at 595 Harbor Street, Morro Bay, California 93442, or by email at [jcraig@morrobayca.gov](mailto:jcraig@morrobayca.gov). We respectfully request the opportunity to provide public testimony at the August 12–13, 2026 Commission meeting.

Page 6

August 11, 2026

Respectfully submitted,

A handwritten signature in black ink that reads "Carla Wixom". The signature is written in a cursive, flowing style.

Carla Wixom

Mayor, City of Morro Bay

*On behalf of the Morro Bay City Council:*

Jeff Eckles, Mayor Pro Tem

Zara Landrum, Council Member

Cyndee Edwards, Council Member

Bill Luffee, Council Member

cc:

Craig Shuman, Marine Regional Manager, CDFW

Jenn Eckerle, Executive Director, Ocean Protection Council

Melissa Miller-Henson, Executive Director, Fish and Game Commission

Senator John Laird, California State Senate, 17th District

Assembly Member Dawn Addis

San Luis Obispo County Board of Supervisors

Morro Bay Harbor Department