Feasibility Evaluation of Round 1 Arrays
for the North Coast Study Region
California Department of Fish and Game
23 March, 2010

I. Executive Summary

Department Guidance and Overview of Evaluation Components

This feasibility evaluation was completed by the Department of Fish and Game (Department) for the North Coast Regional Stakeholder Group (NCRSG). The feasibility evaluation provides detailed feedback on how effectively the external MPA arrays from Round 1 meet Department feasibility criteria. There were a total of eight external MPA arrays (labeled as A – H in all tables below) proposed by community groups in the North Coast Study Region for Round 1. The feasibility criteria used for this evaluation were outlined in the document titled, *Feasibility Criteria and Evaluation Components for Marine Protected Area Proposals* (CDFG, March 23, 2010). These criteria will be used by the Department to make recommendations to the California Fish and Game Commission (Commission) with respect to MPA proposals. The Department did not expect the initial MPA arrays to fully meet Department feasibility guidelines, due to their preliminary nature. However, the evaluation provided for this iteration will serve to focus the NCRSG on the elements that need refinement in order to meet the Department's feasibility guidelines in the next round. MPAs that follow the Department feasibility guidelines will help ensure that MPAs are enforceable and easy for the public to understand. This document provides Department comments and guidance regarding several key issues that emerged within several arrays and are provided below and should be considered during modification of MPA proposals in Round 2 (see sections 2 – 5). A summary of the feasibility evaluation findings is included in Table 1. In addition, detailed evaluations of individual MPAs and arrays are provided within this document (Table 2).

Frequently noted design elements that decrease MPA feasibility include:

- Take regulations that do not include all allowed commercial and recreational take with gear types;
- MPA designs that do not meet guidelines (such as awkward shapes, ribbon designs, and L-shapes);
- Boundaries that are not at readily determined lines of latitude/ longitude or at easily recognizable landmarks (such as points, headlands and buoys);
- Boundaries that are not orientated in a due north/south, east/west direction;
- Boundaries that are based on distance offshore or depth contours;
- Boundary descriptions that do not include explicit description of intended boundaries (e.g., "aligns with headland" or "from the sand / rock interface"); and
- MPA types improperly designated (such as SMRs that allow take).

Table 1. Summary of the feasibility evaluation findings for round 1 arrays. Details of this evaluation can be found in Table 2.

Array	# of Proposed MPAs	% of Proposed MPAs that Meet Guidelines for MPA Boundaries and Design	% of Proposed MPAs that Meet Guidelines for MPA Type and Take Regulations
A	15	46%	20%
B	12	33%	8%
C	15	20%	0%
D	16	37%	0%
E	14	28%	57%
F	13	23%	0%
G	13	23%	0%
H	10	30%	0%

II. General Evaluation Comments

Take Allowances by MPA Type

A variety of the draft MPA arrays include MPAs that propose allowed take not in line with the MPA type proposed. Specifically, some round 1 arrays propose State Marine Reserves (SMR) that allow take. The Marine Managed Areas Improvement Act (MMAIA, Public Resources Code Section 36700-36900) provides definitions for the types of MPAs used in the MLPA process. Under these definitions, "in a State Marine Reserve, it is unlawful to injure, damage, take, or possess any living geological, or cultural marine resource, except under a permit or specific authorization from the managing agency for research, restoration, or monitoring purposes". The Department recommends that if take is allowed in an MPA, an MPA type other than SMR must be applied (e.g. SMCA or SMP).

Boundary Descriptions

A written description of boundaries should be included for each proposed MPA. This includes boundaries with intentional coordinates (e.g., seaward corner placed at whole minute of latitude and longitude), intentional landmarks (e.g., western boundary extends to permanent buoy; southern boundary connects to the shore at north end of Big Rock). While coordinates will be assigned for all boundaries, including written descriptions for MPA boundaries will help facilitate the Department's review of proposals, enhance quality control of proposal maps, and will help ensure stakeholders' intentions are captured in regulatory documents.

In round 1 arrays, some MPAs were described using estimated coordinates for both the state water boundary as the offshore extent and the mean high tide line for the inshore extent. For these boundaries, this level of detail is not necessary. When providing written boundary descriptions for offshore boundaries that

extend to state waters, the offshore boundary can be described as "the offshore extent of state waters", or "the state water boundary", rather than describing this line by estimating coordinates. MPA boundaries that follow the shoreline should be described as "the mean-high tide line".

In estuarine waters (all bays, estuaries, sloughs, channels, and lagoons located within the MLPA study region boundary) it is not necessary to estimate all points of latitude and longitude. Boundaries in estuarine waters should be described using easily recognizable permanent landmarks and/ or the study region boundaries. For example, if an MPA is to cover the entire estuary up to the known extent of marine influence, the boundaries can be described as, "from the mouth of X (insert name of river, slough, bay, etc.) east to the extent of the study region boundary". An MPA in estuarine waters can also be bound by easily recognizable permanent landmarks. For example, these boundaries can be described as, "from A east (or the desired direction) to B" (for A and B: insert description and estimated latitude/longitude for the desired easily recognizable permanent landmarks).

MPA Management Schemes

A variety of the MPAs in external proposed array "A" include MPAs that are proposed as mobile, and are managed by various Marine Stewardship Councils. Mobile MPAs would not meet the goals of the Act and would not be feasible to enforce. Such concepts may be proposed directly to the Commission.

III. Comments on Proposed MPA Design

Awkward Shapes and Wedges

A variety of MPAs proposed in the round 1 arrays meet aspects of the Department's guidelines for MPA design, but nonetheless create designs that may decrease public understanding and enforceability of the regulation. Wedge shapes and other awkward designs are often due to circumstances such as the shape of the coastline, or the presence of offshore rocks that extend the state water boundary beyond three nautical miles offshore of the mainland coast. The Department recommends that proposed MPA boundaries be adjusted or concepts for areas be redesigned to ensure that MPA boundaries are readily determinable, enforceable, and easily understood by the public.

Use of Landmarks vs Readily Determined Lines of Latitude and Longitude

Department feasibility guidelines state that both recognizable permanent landmarks and readily determined lines of latitude and longitude should be utilized for designing MPAs. However, determining when to use one over the other can be challenging. When considering which to use, the Department recommends that stakeholders first consider the overarching aspects of the area under consideration for MPA placement. Some aspects to consider are: accessibility of the site (# of parking spaces, # and capacity of boat launching facilities), and the relative level of shore-based consumptive activity compared to boat-based activity.

In estuarine waters within the MLPA study region boundary, the Department prefers the use of easily recognizable permanent landmarks (such as bridges, etc) to delineate boundaries, to ease enforceability and public understanding of boundaries. In offshore areas that are heavily utilized for shore-based consumptive activities, stakeholders should consider the use of easily recognizable permanent landmarks as higher priority than using major lines of latitude and longitude. For example, if major lines of latitude and longitude will "split" a beach with heavy consumptive use, they should not be used. In cases such as this, the Department recommends that easily recognizable landmarks be utilized to ease enforcement and public understanding of the regulations. For example, if the end of a beach may interface with rocky cliffs, this sand-rock interface may provide an easily understood boundary for shore-based and nearshore boat-based users. For areas that can be characterized primarily by boat-based consumptive activities, either easily recognizable permanent landmarks or readily determined lines of latitude and longitude can be utilized, depending on characteristics of the location under consideration.

Overall, the Department recommends that stakeholders strive to design MPA boundaries that are easily determinable for both boat-based, and land-based consumptive users. In many cases, boundaries placed at easily recognizable landmarks can also be placed at readily determined lines of latitude or longitude by slightly shifting the boundary to the line while still approximating the landmark. Stakeholders should seek solutions that optimize enforceability and ease of understanding for all users.

IV. Evaluation of Proposed Allowed Take

Tribal Uses

A general intent was expressed to allow tribal uses in the round 1 external proposed arrays. For this feasibility evaluation, the Department is providing specific comments only regarding take allowances that provide specific information such as species and gear type, and have an associated level of protection. While there is not currently a regulatory structure to allow for exclusive use of natural resources in marine waters of California, such an option could be explored through the legislative process. Since the Department can not currently grant exclusive rights to take living marine resources, allowed take in MPAs must apply and be available to everyone. In future rounds of MPA proposals, all allowed take should be explicitly stated, with both the species and gear type specified, and should apply to everyone.

V. Evaluation of "Other Proposed Uses"

Allowance for Waterfowl Hunting

Some MPAs propose specifically disallowing waterfowl hunting (see draft arrays B, F-H; Ten Mile Estuary SMR), while others propose MPAs (e.g. SMR, SMCA or SMP) in areas where waterfowl hunting currently occurs. Following policy direction from the Commission, the Department recommends using the State

Marine Recreational Management Area (SMRMA) designation for areas where hunting activities currently occur and specifically allowing hunting to continue. Proposals for waterfowl hunting should be brought to the Department and Commission as part of normal hunting regulations processes, as the Commission regulates hunting separately from the MLPA process.

Retrieval of Lost Traps in an MPA

Some MPAs propose allowing the "removal of recreational and commercial crab traps". The removal of commercial fishing gear from an MPA is not a defined regulated activity that should be applied to an individual MPA. Further guidance on this topic is anticipated from the Enforcement Division in the near future.

Removal of Invasive Species in an MPA

Some MPAs in the Round 1 arrays propose allowing the "removal of invasive species". The removal of invasive species from an MPA is not a defined regulated activity that should be applied to an individual MPA. The Department of Fish and Game has a program regarding invasive species (http://www.dfg.ca.gov/invasives/ and http://www.dfg.ca.gov/ospr/about/science/misp.html) and will work to address these issues as they arise through the existing program.

Existing Permitted Activities or Infrastructure

Existing permitted activities (such as oil and gas leases, aquaculture leases, beach nourishment, dredge disposal sites, wave energy, outfall pipes, maintenance of existing structures such as docks and piers, etc.) should be taken into consideration during MPA design. A new MPA would not automatically prohibit these activities, and such activities may not be removed by MPA designation. In areas where such existing permitted activities are located, the Department recommends using an appropriate designation (e.g., SMCA) and specifically allowing the permitted activity to occur. However, the RSG can identify future uses that may be incompatible with the goals and objectives of a particular MPA, and recommend they be disallowed. See the memo from California's Attorney General; *Establishing, Use and Enforcement of Marine Managed Areas,* 25 September 2009, for guidance on this subject.

Federal Wilderness Act (HR 233)

Some MPAs propose allowing commercial surf fishing and cite the Northern California Coastal Wild Heritage Wilderness Act (NCCWHWA; HR 233) passed by the United States Congress in 2006. While the Act, "…permit[s] the right of entry for authorized vehicle access onto the wave slope area at that area known as Gold Bluffs Beach, Prairie Creek Redwoods State Park…" (see Section 10 (a)-(b)), the Act also states that, "Nothing in this Act affects the jurisdiction of the State of California with respect to fish and wildlife on the public land located in the State" (see Section 4 (j)(2)). This Act would not prevent the RSG from allowing or disallowing the take of living marine resources if an MPA were proposed in the area.

Table 2. Feasibility comments regarding MPA boundaries, design, take allowances, and MPA type for round 1 arrays by area (N/A indicates the array did not propose an MPA in the area). Regarding array A, mobile MPAs were treated as static for the purpose of the evaluation, and Stewardship Zones were not included (see the MPA Management Schemes section of evaluation for guidance regarding the proposed Marine Stewardship Zone concept).

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Pyramid Point	**A-** **B-** **C-** Boundary Description. Written boundary description does not match the shape provided in MarineMap. **D-** **E-** MPA Design. Utilizes a ribbon design that does not meet feasibility guidelines. **F-** MPA Design. See response from MPA array E above. **G-** MPA Design. See response from MPA array E above. **H-** MPA Design. MPA does not extend to the shore.	**A*-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B*-** MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **C*-** **D*-** MPA Type. See response from MPA array B above. **E*-** **F*-** Pyramid Point SMR: MPA Type. See response from MPA array B above. **G*-** Pyramid Point SMR: MPA Type. See response from MPA array B above. **H*-** MPA Type. See response from MPA array B above.
Crescent City	**A-** MPA Boundaries. Design utilizes whole minutes. However, public understanding and enforceability may be improved if boundaries utilized easily recognizable permanent landmarks in this area. See the section "Use of Landmarks vs Readily Determined Lines of Latitude and Longitude" for guidance on this subject. **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A	**A*-** Low LOP & Complex Regulations. Does not provide sufficient protection to meet the goals of the MLPA; and a long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation. **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
False Klamath Cove	**A-** N/A **B-** N/A **C-** **D-** MPA Boundaries. No written boundary description provided, and boundaries are not oriented due East / West. **E-** **F-** N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C*-** **D*-** **E-** **F-** N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Reading Rock	**A-** MPA Design. ▪ Design creates an awkward shape. See the section "Awkward Shapes and Wedges" for further guidance on this type of shape. **B-** MPA Design. ▪ Design creates an awkward shape and cluster orientation. ▪ Design creates a wedge shape that does not meet feasibility guidelines ▪ See the section "Awkward Shapes and Wedges" for further guidance on these types of shapes. **C-** MPA Design. ▪ Design creates an awkward shape and cluster orientation. ▪ Utilizes an "L-shaped" design that does not meet feasibility guidelines. ▪ See the section "Awkward Shapes and Wedges" for further guidance on these types of shapes. **D-** MPA Design. See response from MPA array C above. ▪ And, design creates a wedge shape that does not meet feasibility guidelines. **E-** MPA Design. See response from MPA array C above. ▪ And, design creates a wedge shape that does not meet feasibility guidelines. **F-** MPA Design. See response from MPA array B above. **G-** MPA Design. See response from MPA array B above. **H-** MPA Design. See response from MPA array B above.	A- B*- C*- D*- Reading Rock SMR: MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. E- F*- Reading Rock SMR: MPA Type. See response from MPA array D above. G*- Reading Rock SMR: MPA Type. See response from MPA array D above. H*- Reading Rock SMR: MPA Type. See response from MPA array D above.
Patrick's Point	**A-** N/A **B-** N/A **C-** N/A **D-** **E**- N/A **F**- N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C-** N/A **D*-** **E**- N/A **F**- N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Trinidad	**A-** MPA Boundaries. Design utilizes whole minutes. However, public understanding and enforceability may be improved if boundaries utilized easily recognizable permanent landmarks in this area. See the section "Use of Landmarks vs Readily Determined Lines of Latitude and Longitude" for guidance on this subject. **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A	**A*-** Moderate-Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A
Eureka/ Offshore Humboldt Bay	**A-** MPA Boundaries. Design utilizes whole minutes. However, public understanding and enforceability may be improved if boundaries utilized easily recognizable permanent landmarks in this area. See the section "Use of Landmarks vs Readily Determined Lines of Latitude and Longitude" for guidance on this subject. **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A	**A*-** **B-** N/A **C-** N/A **D-** N/A **E**- N/A **F**- N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
South Humboldt Bay	**A-** MPA Boundaries. The Department recommends the use of easily recognizable permanent landmarks to delineate boundaries in inland waters (e.g. bays, estuaries, sloughs, lagoons, etc). See the section "Use of Landmarks vs Readily Determined Lines of Latitude and Longitude" for guidance on this subject. **B-** MPA Boundaries. See response from MPA array A above. **C-** MPA Boundaries. See response from MPA array A above. **D-** MPA Boundaries. See response from MPA array A above. **E-** MPA Boundaries. See response from MPA array A above. **F-** MPA Boundaries. See response from MPA array A above. **G-** MPA Boundaries. See response from MPA array A above. **H-** MPA Boundaries. See response from MPA array A above.	**A*-** **B-** **C*-** **D*-** South Humboldt Bay SMCA: MPA Type. Waterfowl hunting occurs in this area. In areas where waterfowl hunting occurs, the SMRMA designation should be used. **E-** **F*-** **G*-** **H*-**
Offshore of the Eel River	**A-** N/A **B-** **C-** N/A **D-** N/A **E-** N/A **F-** **G-** **H-**	**A-** N/A **B*-** **C-** N/A **D-** N/A **E-** N/A **F*-** **G*-** **H*-**

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
False Cape	**A-** N/A **B-** N/A **C-** N/A **D-** N/A **E-** **F-** N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C-** N/A **D-** N/A **E-** **F-** N/A **G-** N/A **H-** N/A
Punta Gorda	**A-** **B-** **C-** MPA Boundaries. Not clear if northern boundary is intended to align with an easily recognizable permanent landmark. See guidelines regarding boundary delineation for the northern boundary of this proposed MPA. **D-** **E-** **F-** **G-** **H-**	**A-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B*-** MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **C*-** **D*-** MPA Type. See response from MPA array B above. **E-** **F*-** MPA Type. See response from MPA array B above. ▪ Trap Removal. The removal of gear from an MPA that does not allow that activity is not a defined regulated activity that should be applied to an individual MPA. **G*-** MPA Type. See response from MPA array B above. **H*-** MPA Type. See response from MPA array B above.

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Big Flat/ Shelter Cove	**A-** MPA Boundaries. Design utilizes whole and half minutes. However, public understanding and enforceability may be improved if boundaries utilized easily recognizable permanent landmarks in this area. See the section "Use of Landmarks vs Readily Determined Lines of Latitude and Longitude" for guidance on this subject. **B-** N/A **C-** N/A **D-** **E-** N/A **F-** N/A **G-** N/A **H-** N/A	**A*-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B-** N/A **C-** N/A **D*-** **E-** N/A **F-** N/A **G-** N/A **H-** N/A
Usal / Viscaino	**A-** N/A **B-** N/A **C-** **D-** **E-** **F-** N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C*-** **D*-** MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **E-** **F-** N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Ten Mile	**A-** **B-** **C-** MPA Boundaries. If easily recognizable permanent landmarks are utilized, please include a written description of the desired landmark in the boundary description section of MarineMap. **D-** N/A **E-** **F-** **G-** **H-**	**A*-** MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **B*-** Ten Mile SMR: ▪ MPA Type. See response from MPA array A above. ▪ Invasive Species. The removal of invasive species from an MPA is not a defined regulated activity that should be applied to an individual MPA. ▪ Trap Removal. The removal of gear from an MPA that does not allow that activity is not a defined regulated activity that should be applied to an individual MPA. **C*-** **D-** N/A **E-** **F*-** Ten Mile SMR: ▪ MPA Type. See response from MPA arrays A & B above. ▪ Trap Removal. See response from MPA array B above. **G*-** Ten Mile SMR: ▪ MPA Type. See response from MPA arrays A & B above. ▪ Trap Removal. See response from MPA array B above. **H*-** Ten Mile SMR: ▪ MPA Type. See response from MPA arrays A & B above. ▪ Trap Removal. See response from MPA array B above..

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Ten Mile Estuary	**A-** MPA Boundaries (Inland Boundaries). Eastern boundary should not be a distance inland. Inland boundaries should be placed at easily recognizable permanent landmarks, or at the inland study region boundary (the extent of marine influence). **B-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **C-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **D-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **E-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **F-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **G-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **H-** MPA Boundaries (Inland Boundaries). See response from MPA array A above.	**A-** **B*-** ▪ MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. ▪ Waterfowl Hunting. Waterfowl hunting should not be disallowed in an MPA. If waterfowl hunting occurs in this area the SMRMA designation should be used, and waterfowl hunting should specifically be allowed to continue. ▪ Invasive Species. The removal of invasive species from an MPA is not a defined regulated activity that should be applied to an individual MPA. ▪ Trap Removal. The removal of gear from an MPA that does not allow that activity is not a defined regulated activity that should be applied to an individual MPA. **C*-** **D*-** MPA Type. See response from MPA array B above. **E-** **F*-** MPA Type, Waterfowl Hunting, Invasive Species, and Trap Removal. See response from MPA array B above. **G*-** MPA Type, Waterfowl Hunting, Invasive Species, and Trap Removal. See response from MPA array B above. **H*-** MPA Type, Waterfowl Hunting, Invasive Species, and Trap Removal. See response from MPA array B above.

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
MacKerricher	**A-** N/A **B-** N/A **C-** MPA Boundaries. Boundaries do not follow a due north-south, east-west orientation; the offshore boundary is defined by a depth contour; the boundaries are not located at readily determined lines of latitude and longitude; and is an intertidal MPA. **D-** MPA Boundaries. See response from MPA array C above. **E-** MPA Boundaries. See response from MPA array C above. **F-** MPA Boundaries. See response from MPA array C above. **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C-** Low LOP & Complex Regulations. Does not provide sufficient protection to meet the goals of the MLPA; and a long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation. **D-** Low LOP & Complex Regulations. See response from MPA array C above. **E-** Low LOP & Complex Regulations. See response from MPA array C above. **F-** Low LOP & Complex Regulations. See response from MPA array C above. **G-** N/A **H-** N/A
Noyo	**A-** **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A	**A*-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Point Cabrillo/ Russian Gulch	**A-** **B-** Point Cabrillo SMR: MPA Boundaries. If easily recognizable permanent landmarks are utilized, please include a written description of the desired landmark in the boundary description section of MarineMap. **C-** Point Cabrillo SMCA & Russian Gulch SMCA: MPA Boundaries. See response from MPA array B above. **D-** Point Cabrillo Offshore SMCA & Point Cabrillo SMR: MPA Boundaries. See response from MPA array B above. **E-** Point Cabrillo SMR & Russian Gulch SMCA: MPA Boundaries. See response from MPA array B above. **F-** ▪ Point Cabrillo SMR & Point Cabrillo SMCA: MPA Boundaries. See response from MPA array B above. ▪ Russian Gulch SMCA: MPA Boundaries & Design. Boundaries do not follow a due north-south, east-west orientation; offshore boundary is defined by a depth contour; boundaries are not located at readily determined lines of latitude and longitude; and is an intertidal MPA. **G-** Point Cabrillo SMR: MPA Boundaries. No written boundary description provided. **H-** Point Cabrillo SMR: MPA Boundaries. No written boundary description provided.	**A-** **B*-** ▪ Point Cabrillo SMCA: Moderate-low LOP. Does not provide sufficient protection to meet the goals of the MLPA. ▪ Point Cabrillo SMR: MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **C*-** Russian Gulch SMCA: Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **D*-** Point Cabrillo SMR: MPA Type. See response from MPA array B, "Point Cabrillo SMR" above. **E-** Russian Gulch SMCA: Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **F*-** ▪ Point Cabrillo SMCA: Moderate-low LOP. Does not provide sufficient protection to meet the goals of the MLPA. ▪ Russian Gulch SMCA. Low LOP & Complex Regulations. Does not provide sufficient protection to meet the goals of the MLPA; and a long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation. **G*-** ▪ Point Cabrillo SMR: MPA Type. See response from MPA array B, "Point Cabrillo SMR" above. ▪ Point Cabrillo SMCA: Moderate-low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **H*-** MPA Type. See response from MPA array B, "Point Cabrillo SMR" above.

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Big River Estuary	**A-** N/A **B-** N/A **C-** **D-** **E-** MPA Boundaries (Inland Boundaries). Eastern boundary should not be a distance inland. Inland boundaries should be placed at easily recognizable permanent landmarks, or at the inland study region boundary (the extent of marine influence). **F-** N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C*-** **D*-** **E*-** **F-** N/A **G-** N/A **H-** N/A
Van Damme	**A-** N/A **B-** N/A **C-** MPA Boundaries and Design. Offshore boundary is defined by a depth contour; and is an intertidal MPA.. **D-** MPA Boundaries and Design. See response from MPA array C above. **E-** MPA Boundaries and Design. See response from MPA array C above. **F-** MPA Boundaries and Design. See response from MPA array C above. **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C-** Low LOP & Complex Regulations. Does not provide sufficient protection to meet the goals of the MLPA; and a long list of excepted species to the general regulation makes it difficult to understand and enforce the regulation. **D-** Low LOP & Complex Regulations. See response from MPA array C above. **E-** Low LOP & Complex Regulations. See response from MPA array C above. **F-** Low LOP & Complex Regulations. See response from MPA array C above. **G-** N/A **H-** N/A
Albion (offshore)	**A-** **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A	**A*-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA. **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
Albion River Estuary	**A-** N/A **B-** N/A **C-** MPA Boundaries (Inland Boundaries). Eastern boundary should not be a distance inland. Inland boundaries should be placed at easily recognizable permanent landmarks, or at the inland study region boundary (the extent of marine influence). **D-** MPA Boundaries (Inland Boundaries). See response from MPA array C above. **E-** N/A **F-** N/A **G-** N/A **H-** N/A	**A-** N/A **B-** N/A **C*-** Moderate-low LOP. Does not provide sufficient protection to meet the goals of the MLPA; and proposed regulations may reduce public understanding and enforceability. **D*-** Moderate-low LOP. See response from MPA array C above. **E-** N/A **F-** N/A **G-** N/A **H-** N/A
Navarro River Estuary	**A-** MPA Boundaries (Inland Boundaries). Eastern boundary should not be a distance inland. Inland boundaries should be placed at easily recognizable permanent landmarks, or at the inland study region boundary (the extent of marine influence). **B-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **C-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **D-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **E-** N/A **F-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **G-** MPA Boundaries (Inland Boundaries). See response from MPA array A above. **H-** N/A	**A*-** MPA Type. A SMR designation is not appropriate as take is proposed in this MPA. See the section "Take Allowances by MPA Type" for guidance on this subject. **B*-** ▪ MPA Type. See response from MPA array A above. ▪ Invasive Species. The removal of invasive species from an MPA is not a defined regulated activity that should be applied to an individual MPA. ▪ Trap Removal. The removal of gear from an MPA that does not allow that activity is not a defined regulated activity that should be applied to an individual MPA. **C*-** MPA Type. See response from MPA array A above. **D*-** MPA Type. See response from MPA array A above. **E-** N/A **F*-** ▪ MPA Type. See response from MPA array A above. ▪ Invasive Species & Trap Removal. See response from MPA array B above. **G*-** MPA Type. See response from MPA array A above. ▪ Invasive Species & Trap Removal. See response from MPA array B above. **H-** N/A

Area	Array- Feasibility Comments Regarding Boundaries and MPA Design	Array- Feasibility Comments Regarding Take Allowances and MPA Type*
(North of) Point Arena	**A-** **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A	**A*-** Low LOP. Does not provide sufficient protection to meet the goals of the MLPA; and proposed regulations may be difficult to enforce. **B-** N/A **C-** N/A **D-** N/A **E-** N/A **F-** N/A **G-** N/A **H-** N/A

* Regarding tribal take in MPA's in Round 1: Allowed take for each MPA should be explicitly stated, with both the species and gear type specified, and should apply to everyone. This guidance applies to all MPAs proposed in Round 1 with this type of proposed allowed take.