

BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

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February 3, 2026

To:

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090
Sent via Email: fgc@fgc.ca.gov

Subject: Request that the Commission Decline to Approve Petition No. 202332MPA (Duxbury Reef)

Dear President Zavaleta and Commissioners,

On behalf of the Bolinas Community Public Utility District (BCPUD), we respectfully request that the Commission decline to approve Petition No. 202332MPA submitted by the Environmental Action Committee of West Marin (EAC). As an unincorporated community with no municipal government, Bolinas has long relied on BCPUD as its primary civic forum and conduit for community concerns. In line with this historic role in local and regional advocacy, the District submits the following comments on Petition No. 202332MPA.

We acknowledge the petitioner's longstanding conservation efforts and community outreach. However, many residents have expressed that they were unaware of the petition prior to its submission or did not feel adequately included in its development. This perception has created community strain around a proposal of substantial scope and underscores the need for a well-organized process that incorporates clear, formalized input from all affected stakeholders. Supervisor Dennis Rodoni reached a similar conclusion in withdrawing his support on January 15, 2026.

BCPUD is not opposed to the concept of enhanced stewardship or protection at Duxbury Reef. However, the petition does not yet provide several analyses that are typically foundational to a regulatory change of this magnitude.

Because this matter involves ecological, cultural, and community considerations that cannot all be fully addressed in a brief letter, BCPUD has also prepared a more detailed letter addressed to the Bolinas community, providing additional background and explanation of the process and reasoning underlying our conclusions. That letter is available on our website (www.bcpud.org/duxbury-letter-to-community). What follows here is a concise summary of the key concerns most relevant to the Commission's decision.

• **Lack of analysis on visitation, ecological impacts, and management needs.**

The petition does not evaluate how redesignation to a State Marine Reserve (SMR) may change visitation levels or pressures on sensitive intertidal habitats. While available studies suggest that visitation at MPAs is influenced primarily by site accessibility, not designation alone, redesignation could nonetheless draw additional attention to an already well-known and easily accessed tidepool system. Even a modest increase in visitor traffic could have meaningful ecological consequences at Duxbury Reef. The petition does not assess how visitor use might change under an expanded SMR, nor how any resulting impacts would be managed. This gap is especially concerning given acknowledged enforcement limitations and the absence of a plan describing how a complex protected area would be supported.

• **Major unexamined shift in fishing access and impacts on the fishing community.**

The petition proposes eliminating all fishing within the expanded SMR, a substantial departure from current SMCA rules that allow limited finfish fishing and support longstanding fishing practices in Bolinas. While local advocates made informal outreach efforts to the fishing community, this input is not documented or incorporated into the petition, nor does the petition analyze the socioeconomic or cultural impacts of removing this access. The petition

also acknowledges that there is no evidence that existing legal fishing practices are causing ecological harm. Without evaluating the necessity of a full prohibition or its impact on affected residents, the proposed elimination of fishing access remains unsupported.

• **Lack of ecological data substantiating the need for redesignation.**

Although educators and other community members have reported observational changes in species abundance, neither the petition (nor its critics) provide current, site-specific ecological information demonstrating that acute decline is occurring or whether conditions are stable. Without such data, it is not possible to determine whether redesignation would effectively address the concerns raised or could inadvertently exacerbate them, particularly in the absence of a corresponding management or enforcement plan. In the absence of this determination, proceeding with redesignation is unsupported.

Considering these gaps, and the lack of demonstrated urgent ecological harm, BCPUD believes advancing Petition No. 202332MPA at this time would be premature. A more collaborative, data supported evaluation would allow time to:

- Clarify the specific ecological concerns at Duxbury Reef using updated, site-specific- information;
- Determine ways to strengthen compliance and management under existing SMCA regulations;
- Assess whether redesignation to an SMR would provide any additional ecological benefit in the absence of new enforcement or management resources; and
- Engage all affected stakeholders — including the fishing community, educators, residents, and local families — through a well-organized- and inclusive community process before pursuing major regulatory changes.

For these reasons, we respectfully request that the Commission:

1. **Decline to approve Petition No. 202332MPA; and**
2. **Encourage the petitioner to reengage the Bolinas community in a well-organized, collaborative, science-supported process before submitting any future proposal.**

or, **if the Commission chooses not to reject the petition in full,**

3. **Preserve the limited finfish fishing currently allowed under the existing SMCA rather than adopting the proposed full prohibition.**

The BCPUD Board stands ready to participate constructively in any future process that seeks to protect the reef while honoring the needs, values, and traditions of the Bolinas community.

Thank you for your consideration.

Sincerely,



Jack Siedman
President, Board of Directors
Bolinas Community Public Utility District
On behalf of the full BCPUD Board