



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Marine Region  
1933 Cliff Drive, Suite 9  
Santa Barbara, CA 93109  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



December 4, 2025

County of Santa Barbara Fish and Wildlife Commission  
Santa Barbara County Planning & Development Department  
123 Anapamu St.  
Santa Barbara, CA 93101

**SUBJECT: Review of Fish and Wildlife Propagation Fund Application**

Dear County of Santa Barbara Fish and Wildlife Commission:

The California Department of Fish and Wildlife (Department) has conducted a review of the application entitled “Goleta Kelp Reef Improvement Project” received on November 17, 2025. The application was submitted under Fish and Game Code section 13103, subsection (i) which requires projects eligible for funding to be scientific fish and wildlife research conducted by institutions of higher learning, qualified researchers, or governmental agencies, if approved by the Department. The scope of Department’s review was limited to determining if the work described in the application meets the definition of “scientific research”. The definitions of “science” and “research” in California Code of Regulation, Title 14, section 650 subsections (b)(23) and (b)(24) guided our review.

The project referenced in the application was installed in March 2024 and permitted in part by Coastal Development Permit De Minimis Wavier 9-23-0202-W<sup>1</sup> (Waiver). The Waiver describes the required monitoring as a five-year monitoring program developed in coordination with Department staff and includes quarterly monitoring to document species recruitment, habitat type, total biomass, species abundance, diversity, commercial and recreational fishing use, and structural integrity. Data and analysis from the monitoring program would be compiled into annual reports and distributed to resource agencies for review. **Based on our review, the Department finds that the monitoring program described in the Waiver meets the scientific research requirement of Fish and Game Code 13103, subsection (i).**

Prior to initiating this review, the Department was informed by Coastal Commission staff that some components of the monitoring program outlined in the Waiver have not been met. Coastal Commission and Department staff have reviewed the “2025 Goleta Fish Reef Project Annual Report” submitted by the applicant on November 25, 2025, and identified deficiencies in the implementation of the monitoring program. Coastal Commission staff have informed the Applicant (see Attachment 1) and have requested a meeting to discuss steps that will need to be taken to bring the project into compliance with the monitoring requirements.

*Conserving California’s Wildlife Since 1870*

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If you have any questions or need additional information, please contact me at (805) 568-1246 or by email at [r7regionalmgr@wildlife.ca.gov](mailto:r7regionalmgr@wildlife.ca.gov).

Sincerely,



Craig Shuman, D. Env.  
Marine Regional Manager

Attachment

1. Email correspondence between Coastal Commission Staff and Applicant regarding Annual Report

ec: Cyndi Dawson, Senior Environmental Scientist Specialist  
California Department of Fish and Wildlife  
[Cyndi.Dawson@wildlife.ca.gov](mailto:Cyndi.Dawson@wildlife.ca.gov)

Kirsten Ramey, Environmental Program Manager  
California Department of Fish and Wildlife  
[Kirsten.Ramey@wildlife.ca.gov](mailto:Kirsten.Ramey@wildlife.ca.gov)

Kristen Elsmore, Ph.D., Senior Environmental Scientist Specialist  
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Cassidy Teufel, Deputy Director  
California Coastal Commission  
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Wesley Horn, Senior Environmental Scientist  
California Coastal Commission  
[Wesley.Horn@coastal.ca.gov](mailto:Wesley.Horn@coastal.ca.gov)

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<sup>1</sup> <https://documents.coastal.ca.gov/reports/2023/10/F7/F7-10-2023-report.pdf>

## **Attachment 1: Email correspondence between Coastal Commission Staff and Applicant regarding Annual Report.**

**From:** Horn, Wesley@Coastal <Wesley.Horn@coastal.ca.gov>  
**Sent:** Thursday, December 4, 2025 8:02 AM  
**To:** Chris Goldblatt <chris@fishreef.org>  
**Cc:** Dawson, Cyndi.@Wildlife <Cyndi.Dawson@Wildlife.ca.gov>; Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>; Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>  
**Subject:** RE: final Goleta report

Hello Chris,

Thank you for submitting your required annual report on 11/25/25. We have reviewed the 2025 Annual Report in consultation with the Department of Fish and Wildlife (CDFW) and found there are several significant deficiencies when compared to the approved "Santa Barbara Kelp Restoration Reef – Goleta Study Site Monitoring Program November 23, 2023" (Monitoring Program) and the requirements outlined in De Minimums Waiver 9-23-0202, including but not limited to the deficiencies we previously communicated to you in our September 19, 2025, email. We would like to set up a meeting after the New Year to discuss steps that will need to be taken in order to bring the project into compliance with the monitoring requirements. Please send us your available dates and times and I will coordinate with other Coastal Commission staff and CDFW staff to schedule a meeting. Generally, we are concerned about the lack of the required scientific rigor in implementing the approved Monitoring Program. We have outlined some additional specific areas of concern below that we would like to discuss during the meeting.

- Sampling Frequency: Q1 2024 at the time of installation and Q1 and Q4 2025 monitoring did not occur.
- Control Sites: Natural Reef Control Site was not surveyed at all sampling events. Pre-project sampling and either Q3 2024 or Q3 2025 (there is conflicting data in submitted reports) did not occur at the Natural Reef Control Site.
- Field Methods: The 2025 Annual Report includes descriptions of significant changes in methods from the approved Monitoring Program. Changes to the sampling unit (e.g. 30 x 2 m to 12 x 2 m), replicates, methods (e.g. benthic swath to 1 m<sup>2</sup> quadrats) and any deviation from PISCO methods require an amended Monitoring Program to be approved by the resource agencies. None of the field method changes were discussed with resource agencies prior to making changes. It is unclear what the sampling unit, replicates, distribution of replicates across site and methods are being used at each sampling site.
- Analytical Methods: It is unclear what methods are used for reported calculated values (e.g. mean g/m<sup>2</sup> and mean fish/m<sup>2</sup>). Neither the methods section nor figure captions contain the required information on what data specifically were used to calculate means. Without detailed analytical methods we are unable to evaluate the reported values and the performance of the artificial reef in meeting its goals and objectives.

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- Missing data: Opportunistic observations of fishing use during monitoring events are likely not going to be sufficient to establish fishing use patterns. No quantitative data has been reported for fishing use. No quantitative data has been reported for the required complete inventory and size of spiny lobster and giant kelp on the artificial reef only. No quantitative data has been reported on structural integrity of the artificial reef.
- Reporting: The 2025 Annual Report is missing critical information and analyses required by the approved Monitoring Program. There is minimal comparison among sites, only UPC, biomass, size structure values are reported and there is no statistical analysis among sites. Quantitative data and comparative analysis of species diversity, structural integrity and fishing use are not included.

Please let me know if you have any questions,

**Wesley Horn**

Senior Environmental Scientist | California Coastal Commission

Energy, Ocean Resources and Federal Consistency

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