



Letter on the Next Page

May 10, 2021

Jennifer Norris
Deputy Secretary for Biodiversity and Habitat
California Natural Resources Agency
1416 Ninth Street
Sacramento, CA 95814

Re: Implementation of Executive Order N-82-20 (30 by 30 Strategy)

Dear Deputy Secretary Norris:

On behalf of the undersigned organizations, we are writing to provide our initial recommendations regarding the development of the state's 30 by 30 strategy. Executive Order N-82-20 set forth an exciting and bold goal for the state to conserve 30 percent of its lands and coastal waters by 2030 as part of the global effort to combat the biodiversity and climate crises. We applaud the Newsom Administration for reinforcing that these goals should also expand equitable access and recreation for all Californians. This effort will build on existing partnerships, but also presents the opportunity to create new partnerships, for instance by entering into co-management agreements that support Tribes' ability to conserve lands and natural resources in ways that respect Tribal sovereignty; or by working with ranchers, farmers, and other private property owners who voluntarily decide to support 30 by 30 and Climate Smart goals. We recognize the California Natural Resources Agency (CNRA) will receive comment from many stakeholders and that incorporating the broad array of California interests into the final plan is crucial for its success.

It is in the spirit of partnership that our organizations offer the following recommendations regarding public engagement and key components for a successful and inclusive 30 by 30 strategy. The COVID-19 public health crisis has shown the importance of open space for our collective physical and mental wellbeing while reminding us that these resources are not distributed equitably. It is also important to recognize that the public health and resulting economic crises impacts all Californians, but that there are disproportionate impacts on Tribes and communities of color, as well as the community-based organizations that serve them. CNRA should clearly state at the beginning of its stakeholder outreach what this process will do, and how it will meaningfully incorporate feedback from communities facing numerous stresses, and how it will provide tangible benefits and measurable outcomes for all.

As part of the public engagement, we believe it is important for CNRA to identify early in the process how the 30 by 30 Strategy and the Climate Smart Lands Strategy differ and, at the same time, overlap for purposes of providing recommendations. To give community members something tangible to respond to, CNRA should build its public engagement around suggested proposals. For example, CNRA should ask stakeholders to respond to a suggested definition of what "conserve" means within the context of the Executive Order rather than presenting this as an open question. Additionally, we urge CNRA to explain in the stakeholder meetings how the development of the GIS tool will proceed, including how data will be collected and synthesized; the opportunities for stakeholders to contribute and comment on the data and analytical process; and what specific questions the GIS tool will be designed to answer. Finally, we believe it is important for this process to proceed with a clear understanding of timelines and the opportunities for public comment and

review of drafts of the strategies. We also recognize that CNRA will be conducting government-to-government consultation, but we request that all aspects of this process will support and include the work of Tribes to achieve their land management and restoration goals with respect to their ancestral lands.

In addition to ensuring a meaningful, inclusive, and transparent public engagement process, we offer the following recommendations for the 30 by 30 strategy:

- The state must work with all Californians but especially black, indigenous, and people of color (BIPOC) and other equity leaders on a strong definition of equity and commit to upholding this value and helping others to as well, engage the communities most impacted by loss of access to nature as early as possible, give these communities plenty of time and advance notice to provide input, and honor the generational knowledge and lived experience of historically oppressed groups.
- A clear and mappable definition of what is “conserved” is pivotal to understand what is already conserved and what will need to be conserved to meet the 30 by 30 goal. Being able to track what is conserved in a geographic framework will be critical to evaluate progress towards the goal over time. We offer the following two options for a definition of “conserved”:
 - Use the [International Union for Conservation of Nature \(IUCN\) protected areas classifications](#): The IUCN protected area management categories classify protected areas according to their management objectives. The categories are recognized by international bodies such as the United Nations and by many national governments as the global standard for defining and recording protected areas and as such are increasingly being incorporated into government legislation. The IUCN 6 Categories are: Ia. Strict Nature Reserve; Ib. Wilderness Area; II. National Park; III. Natural Monument or Feature¹; IV. Habitat/Species Management Area; V. Protected Landscape/ Seascape; VI. Protected area with sustainable use of natural resources. Using some or all categories for California has the advantage of being consistent with how the federal government is likely to define “conserved” for the purposes of attribution toward a 30 by 30 goal. Given many important conservation lands are not tracked in the IUCN classification in the California data in PAD-US (e.g., state parks), additional review of other “unclassified” lands will be necessary.
 - A General Definition that merges the 6 IUCN categories into one definition. The following is a suggested general definition: A Conserved Area, whether terrestrial, freshwater or marine, must: (1) be established with enduring measures; (2) support thriving biodiversity, contribute to climate resilience, and provide ecosystem services; (3) be restored and/or managed such that their natural character, resources, and functions exist for current and future generations and (4) respect Tribal sovereignty

¹ Although the IUCN categories do not explicitly mention wild and scenic rivers, we believe that protected rivers belong under Category III. National Monument or Feature.

and the right to Tribal self-determination so that Tribal communities can fulfill their priorities for the stewardship of their natural, cultural, and historic resources.

- Specific, measurable, achievable, realistic, and timebound (SMART) goals that will ensure measurable outcomes, including an interim conservation goal for 2025 (for instance, increasing California's protected lands from the current 22% to 25%) and a system for tracking achievement of the goals, including reporting on progress every 2 years.
- Specific goals and recommendations for how the state will advance **equity, access, and public health** for communities of color and underserved communities to address environmental injustice and ensure that the benefits of nature are distributed equitably. An essential part of advancing this goal is planning for and providing new state and local protected lands in underrepresented areas without the risk of displacement.
- Specific goals and recommendations for how the 30 by 30 process will respect Tribal sovereignty and support Tribes in managing lands and resources that include their ancestral homelands. The state must consult with Tribes early in this process to inform how the state can support the designation of Indigenous-proposed protected areas as well as facilitating and prioritizing access to and use, restoration, and management of lands by tribes with historical connections to the land.
- Goals and recommendations for securing increased protections on state and federal lands and waters (e.g., new wilderness, monuments, wild and scenic rivers, outstanding national resource waters, or other new areas of permanent protection) and the management of state and federal lands that will help achieve the state's 30 by 30 goals.
- An implementation plan that identifies 2-year and 5-year priority actions and responsibilities that will help California achieve the interim goal and set the state on path to reach the 2030 goal. Implementation should also include a plan for continued stewardship and management of lands identified in the 30 by 30 process for the benefit of future generations.
- A state and federal funding strategy in which the state identifies existing state conservation funding streams that could be coordinated and used to achieve 30 by 30 goals. This funding strategy also should identify existing federal conservation funding streams that could be directed to 30 by 30 goals and work with the federal administration to target those funds, as appropriate, toward state and federal conservation goals. Finally, the state should identify new state and federal sources of funds necessary to achieve the 30 by 30 strategy's goals.
- A capacity strategy that identifies how to support technical, capacity building (e.g., job training/development), and funding needs of potential local governments, Tribal governments, farming, ranching, community-based organizations, and NGO partners willing to help achieve 30 by 30 goals and how to support those entities.

- The identification of where (e.g., habitat types and/or locations) it is necessary to restore areas to contribute to the state's 30 by 30 goals and strategies for accelerating and scaling up restoration efforts.
- A strong scientific framework informed by a science advisory panel. This panel should be focused on identifying what species and habitat need to be conserved to protect California's biodiversity, including maintaining healthy populations of common species and recovering declining species. The panel should also provide input as to what conservation and management actions will be important to create a climate resilient landscape for biodiversity and people. For example, the panel should with CNRA engage experts and stakeholders to answer the following questions: (1) What is currently protected and already contributing to a 30% target in California? (2) What should be protected in California to achieve 30 by 30 and Climate Smart goals? (3) What metrics of biodiversity, resilience, and sequestration should be used to identify opportunities? (4) What and where are the best opportunities to protect biodiversity and promote resilience for people and ecosystems at scale? (5) What would be a suitable mix of large landscape designation and smaller but networked designations to achieve conservation objectives, such as habitat connectivity? (6) What is the social science on principles for effective co-management? (7) What role can urban parks and urban river restoration play in this process? (8) What role can agroecology play in this process? (9) What is an economical science-based method for measuring the effectiveness of protected areas? Finally, the panel should provide recommendations on the development of the GIS tool to collect information, guide prioritization, and illustrate progress towards the 2030 goal.

We look forward to working with you to implement Governor Newsom's ambitious effort to ensure that all Californians will enjoy access to a healthy and climate resilient environment in which biodiversity and people thrive. Thank you for taking our recommendations into consideration.

Sincerely,

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