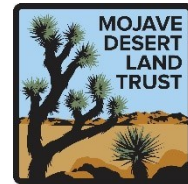
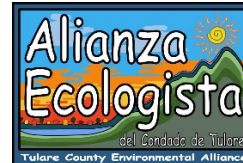




CONSERVATION LANDS FOUNDATION



Wildlands NETWORK



Letter is on the next page.

October 11, 2021

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

**Re: 30x30 Pathways Report Recommendations for Public Lands**

Dear Deputy Secretary Norris:

On behalf of the undersigned organizations, we are writing to provide recommendations regarding the role of public lands as part of the development of the state's 30x30 Pathways Report. 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 and to do so in a manner that will advance equity and address racism.

More than 50% of California is publicly owned with the vast majority managed by federal agencies. Indeed, the federal government manages 47,797,533 acres out of 100,206,720 total acres in California (47.7% of California's total acres). Statewide, more than 20% is under U.S. Forest Service (Forest Service) management, 15.3% is managed by the Bureau of Land Management (BLM), 7.6% is managed by the National Park Service (NPS), 1.9% is managed by the Department of the Defense (DOD), and 471,255,000 acres are managed by the U.S. Fish and Wildlife Service (USFWS) as national wildlife refuges and wildlife management areas.

The state owns and manages nearly 7 million acres of land. Of those acres, 1.3 million are state parks, the Department of Fish and Wildlife (DFW) manages more than 1.1 million acres, and CAL FIRE manages 72,000 acres as demonstration forests. The State Lands Commission (SLC) manages 4 million acres of Public Trust Land and has jurisdiction over school lands throughout the state that includes surface and mineral ownership of approximately 469,000 acres and the mineral rights to an additional 790,000 acres.

Many of these lands are already protected and managed, including state and national parks, DFW ecological reserves and wildlife areas, national wildlife refuges, national monuments, National Conservation Lands, and state and federal wilderness areas. However, some of these protected lands need restoration to address past poor management, ongoing impacts from illegal activities such as cannabis cultivation and off-highway vehicle use, and invasive species. Further, these protected public lands need ongoing investments in management to ensure that they are

providing conservation benefits over the long-term and in the face of climate change and provide an opportunity to expand equitable access to nature.

As detailed below, there are significant opportunities for state and federal public lands to play an important role in California's effort to achieve the biodiversity, equity and climate goals set forth in Executive Order N-82-20. For state and federal public lands to count towards a 30x30 goal, they must meet a definition of conserved. Our organizations have already commented that for lands and waters to be considered "conserved" they should (1) be established with enduring (durable over the long-term) measures; (2) be established with the intention to support thriving biodiversity, contribute to climate resilience, and provide ecosystem services; (3) be managed and/or restored such that the lands' and waters' natural character, resources, and functions exist for current and future generations and (4) respect Tribal sovereignty 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. While some of the recommendations below do not meet this definition of "conserved" either because the land designation is not durable or the land is not primarily managed for biodiversity protection, those recommendations were included because they could still fulfill equity, access, or climate resiliency goals. Moreover, some of these recommendations could move state and federal public lands closer to what is necessary for conservation and therefore could, in the future, with additional protections, count towards a 30x30 goal or count towards the longer-term goal of 50 percent conservation by 2050.

California can have a significant influence on how federal public lands contribute to the state's 30x30 goal by advocating for changes in designation on federal lands such as increasing protections for California's 4.4 million acres of inventoried roadless areas; the creation of new parks, national monuments, and national wildlife refuges through administrative or legislative actions; and funding of acquisitions that add to the public land base. Further, California, through direct action, can add to its own state public lands base through the creation of new parks and wilderness areas, the addition of new state wildlife areas and ecological reserves, and changes to how land is managed by state agencies such as CAL FIRE and the SLC.

#### **I. The state needs to advance equity along with land and water protection.**

California has an opportunity to ensure that its 30x30 efforts will provide social, health, environmental and economic benefits to all communities, but particularly for those communities that have suffered from the disproportionate impacts of pollution, environmental degradation, and racism. We support the recommendations made in the June 25, 2021, letter to Deputy Secretary Norris from the 30x30 California Coalition's Equity Committee. In addition to those recommendations, we urge the state to include more diversity in its staffing for state parks and other public lands agencies. Finally, we urge the state to expand efforts to build greater capacity in local and regional organizations serving underrepresented communities, including expanding grant programs to include more capacity building funding for environmental justice groups and

other community-based organizations. Capacity and technical assistance will be critical for a wider range of entities to participate in public land acquisition and restoration efforts.

## **II. The State must prioritize Tribal engagement as part of 30x30.**

Meaningful consultation with Tribes is critical to the success of 30x30, but capacity constraints at Tribes can hinder their ability to engage. We urge the state to support Tribes on the important issues of land return, co-management of lands and stewardship of lands as well as to look for opportunities to build capacity. Lands returned to Tribes and Tribal organizations should be endowed for Tribes to manage and steward these lands. In addition, the state needs to continue to work to address current state regulations that make Tribal prescribed burns, management, cultural practices, and stewardship difficult on different land types. We appreciate that the state has invested \$20 million in a Tribal grant program for fuels management. We urge the state to continue and expand these efforts, including promoting cooperative agreements with interested Tribes to co-manage wildfire on public lands. The state should consider creating a Tribal Fund that can be used for grants to Tribes to support their efforts to identify and secure lands of importance to Tribes as well as for the management of lands once secured, or co-managed.

## **III. California can take action to increase protections on federal public lands and waters.**

### **a. Support federal legislative efforts.**

California should support federal legislation to increase protections on existing federal lands and waters or to create new protected federal public lands and communicate that support to the federal administration and the California congressional delegation. The state should support the following current and proposed federal legislation:

- Continue to support the Protecting Unique and Beautiful Landscapes by Investing in California (PUBLIC) Lands Act (S.1459), which would increase protections for public lands throughout northwest California, the Central Coast, and Los Angeles and significantly contribute to the 30x30 goal. It would designate nearly 600,000 acres of new wilderness, more than 583 miles of new wild and scenic rivers and expand an existing national monument by over 100,000 acres. In addition, this bill would restore forests, habitat, and fisheries and promote fire resilience on more than 871,000 acres of mostly logged national forest in Trinity and Humboldt counties. Finally, this bill would require the Forest Service and the BLM to work with residents to create a new coordinated fire management plan for all the designated wilderness areas in Northwest California.
- Support legislation introduced by Rep. Raul Ruiz to protect the 4.2 million acres of National Conservation Lands in the California desert, which were identified as having important biodiversity values as part of the ten-year state and federal effort that resulted

in the Desert Renewable Energy Conservation Plan (DRECP). In the DRECP, the National Conservation Lands were designated as permanently protected and their designation could only be changed by Congress. Former Interior Secretary David Bernhardt mis-interpreted the 2009 Omnibus Public Lands Act and the 2019 John Dingell Act allowing development activity on millions of acres of National Conservation Lands in the desert. Rep. Ruiz's legislation would ensure that future federal administrations will abide by the original intent of the sections of the 2009 and 2019 statutes relating to desert lands authored by Senator Dianne Feinstein.

- Support Rep. Ken Calvert's Western Riverside County Wildlife Refuge bill (H.R. 972), which was approved as an amendment to H.R. 3684. If this proposal is enacted, it would designate 500,000 acres as a National Wildlife Refuge, contributing half a million acres to the state's 30x30 goal. Three hundred and fifty thousand acres are existing National Forest system land from Cleveland and San Bernardino National Forests and other state and federal land. The remaining 150,000 acres are to be acquired, one-third, by the state and federal governments, and two-thirds from private landowners through the Western Riverside County Regional Conservation Authority.
- Support the designations of new or expanded national monuments, including Representative John Garamendi's draft Berryessa Snow Mountain National Monument Expansion Act and other National Monument efforts being developed around the state. We expect additional national monument proposals to emerge soon, and we encourage you to consider supporting them if they are well-vetted and have strong local support.
- The state should urge Congress to codify into law the Forest Service's recommendations to designate nearly 400,000 acres as wilderness in the 2014 Records of Decision for the Final Supplemental Environmental Impact Statement for the Four Southern California National Forests Land Management Plan Amendment.
- Encourage members of the California Congressional delegation to introduce new measures to protect federal lands and waters. A few promising regions for new near-term legislative proposals include:
  - Conglomerate Mesa additions to the existing Malpais Mesa Wilderness in Inyo county in Representative Orberolte's district.
  - Forest Service recommended wilderness and other important BLM and National Forest lands in San Diego County in Representative Issa's district.
  - Forest Service recommended Castaic Proposed Wilderness in the Angeles National Forest in Representative Garcia's district.

- Forest Service recommended wilderness and vast areas of possible new BLM wilderness in Riverside County in Representative Ruiz's district.
- Support legislation to increase parks and open space for underrepresented communities, such as the Outdoors for All Act, which would create a dedicated source of funding for projects that expand outdoor recreational opportunities in urban and low-income communities across the nation. This bi-partisan bill was introduced at the end of September by U.S. Senators Alex Padilla (D-Calif.) and Susan Collins (R-Maine). This bill was introduced in the House of Representatives by Representative Nanette Diaz Barragán (D-Calif.) and Representative Mike Turner (R-Ohio) and passed as an amendment to H.R. 803.
- Support the Wildlife Corridors Conservation Act, which passed the United States House of Representatives as part of H.R. 3684, the INVEST in America Act. If enacted, this bill would grant authority to key federal agencies to develop a National Wildlife Corridor System on federal public land; dedicate \$50 million per year to a Wildlife Movement Grant Program that will incentivize state and Tribal agencies and interested private landowners to improve habitat connectivity on non-federal lands; contains the provisions of the Tribal Wildlife Corridors Act, previously introduced by Representative Ruben Gallego (D-AZ), which provides funding and support for Tribal nations to establish and manage wildlife corridors on Tribal lands; and creates a National Wildlife Corridor Database—which will be freely available to states, Tribes, federal agencies, and the public—to support decisions about wildlife corridors and develop strategies to enhance habitat connectivity.
- Support the Roadless Area Conservation Act (S. 877/H.R. 279), which would prohibit the U.S. Department of Agriculture from allowing the construction of roads, the reconstruction of roads, or logging in an inventoried roadless area where those activities are prohibited by the Roadless Area Conservation Rule (i.e., federal regulations relating to roadless area management). While this bill would strengthen the durability of the conservation protections in the Roadless Rule, it would continue to allow for the construction of new off-road vehicle routes in inventoried roadless areas, which undermines the conservation value of these areas because it would result in increased negative environmental impacts on habitat, air quality and water quality. If this bill were enacted with a fix to the OHV route issue, it would result in the addition of 4.4 million acres of roadless area to California's goal of "conserved" lands.

**b. Support and request increased and/or new protections on federal public lands through administrative action.**

**i. National level federal administrative actions.**

As part of its 30x30 efforts, California can directly ask for or support administrative action at the national level that will have significant conservation benefits for the state. In addition, California should request that the Biden administration expand the U.S. Department of the Interior's big-game wildlife corridors secretarial order to expand its current list of important wildlife corridors beyond the limited number of big-game species and beyond only big-game species (e.g., bighorn sheep, mountain lion, and monarch butterflies) open it to include the U.S. Department of Agriculture.

**ii. State level federal administrative actions.**

While federal land management agencies are charged with deciding how to manage federal public lands under federal law, California can have significant influence over those land management decisions. The state should participate actively in all federal land management planning efforts if those efforts can result in increased and/or new protections on federal public land. State agencies, including the Natural Resources Agency, DFW and CAL FIRE, should participate in the planning and comment periods to ensure that the federal agencies are clear about the state's goals and requested outcomes. Further, if federal agencies fail to respond adequately to the state's requested land management actions, the state can challenge those decisions. California's engagement in the Bush Administration's proposed revision to the Roadless Rule, in which the federal government was proposing to significantly scale back the 4.4 million acres of roadless area protection, resulted in a favorable outcome in which those lands remained protected. Further, California's engagement in the land management plan amendment process for the four Southern California Forests resulted in significantly increased wilderness recommendations in 2014

Therefore, we urge the state to include the following in its 30x30 Pathways strategy and to take the following actions:

- Urge the BLM to use its Federal Land Policy and Management Act (FLPMA) Section 202 authority to designate of BLM-inventoried Lands with Wilderness Characteristics (LWC) as Wilderness Study Areas (WSAs) and request that the agency adopt a national policy committing BLM to its longstanding interpretation of FLPMA as permitting designation of WSAs under Section 202 and direct the BLM to evaluate and designate areas for WSA status. Statewide or programmatic (multi-state) Environmental Impact Statements and land use plan amendments are the administrative vehicles to move this initiative forward. States or areas of states without current inventories should be directed to undertake and complete that work within six months.

- Urge the BLM to implement the Desert Renewable Energy Conservation Plan (DRECP) properly and not waive or change important Conservation Management Actions (CMAs) such as the “microphyll woodland” CMA. Considering the millions of dollars spent by the state as part of the DRECP planning effort, the state has considerable influence with the BLM regarding the implementation of the DRECP. California also should partner with the BLM through the new state Assistant Secretary for Tribal Affairs to consult with the Tribes on the DRECP implementation. Finally, California should provide guidance and incentives for the desert counties to complete the private lands component of the DRECP through the creation and implementation of Regional Conservation Investment Strategies (RCISs), Natural Communities Conservation Plans (NCCPs), and other land use planning efforts that protect important conservation lands and direct development into lower conflict areas.
- Petition the federal administration to designate the Sierra Nevada and Mojave desert as climate refugia. Both places are identified as such by the Refugia Research Coalition ([www.climaterefugia.org](http://www.climaterefugia.org)).
- Partner with the U.S. Fish and Wildlife Service, conservation organizations, land trusts and the philanthropic community to promote the protection, acquisition and management of wetlands, restorable wetlands, pathways for tidal wetlands to migrate upslope as sea levels rise, and other shoreline habitat in San Francisco Bay within the expansion boundaries of the San Francisco Bay National Wildlife Refuge Complex. Long-term management of tidal wetlands not only protects biodiversity, but also benefits the State’s goals of reduction of atmospheric carbon through sequestration.
- Advocate for the identification and protection of wildlife corridors in federal land plan updates, like what was done in the DRECP. The state should also support federal, state, and private partnerships (like the [Liberty Canyon project](#)) to protect, restore and enhance important wildlife corridors.
- Advocate for the implementation of the recommendations within [the California Wildlife Action Plan](#) in all federal land plan updates.
- Actively engage with the DOD and individual military installations in the state as they revise and implement existing comprehensive plans for natural resource conservation and management (e.g., fish and wildlife, forestry, land management, outdoor recreation) for each installation, as required under the federal Sikes Act. These conservation plans, known as Integrated Natural Resource Management Plans (INRMP), focus on ecosystem-based management on DOD lands with a goal of managing the natural resources to meet stewardship requirements while supporting, and even enhancing, military operations.



Each military installation prepares an INRMP in cooperation with the USFWS and DFW. Under the Sikes Act, DFW must review and concur in each INRMP. This provides the state with an important opportunity to further 30x30 goals on DOD lands.

- Actively engage in federal land management planning processes to advocate for 30x30 goals. As of May 1, 2021, there are federal land plan revision processes underway for 6.3 million acres of federal public land in California (more than 6% of the state), including the Sierra, Sequoia, Six Rivers, Mendocino, Klamath, and Shasta-Trinity National Forests and the BLM Arcata, Ukiah, and Redding Field Offices.
  - **The Northwest Forest Plan** amendment is a landscape approach to public land management designed to contribute to social and economic sustainability in the region, while protecting threatened and endangered species in late successional and old-growth forest habitats. In 1994, the Northwest Forest Plan amended existing forest plans on 19 national forest units across Washington, Oregon, and California. This plan provided administrative protections to important habitats on 11 million acres of national forest land. Under the Biden administration, the Forest Service is starting the process to update the Northwest Forest Plan and the underlying forest plans. California should engage in this planning effort once the revision process begins to assist the Forest Service in developing science-based strategies to protect and connect viable populations of at-risk fish, wildlife, and plant populations, to restore healthy wildfire to degraded forested areas and watersheds, and to ensure that the Northwest Forest Plan contributes to the recovery of imperiled fish and wildlife. The revision of the Northwest Forest Plan also offers an opportunity to engage with communities and elevate Tribes' knowledge and practices on the best ways to protect nature for future generations and on how to achieve the 30x30 goals with durable and lasting designations.
  - **The Sequoia National Forest:** The Forest Service has issued a draft land management plan in which very little new wilderness has been proposed out of the hundreds of thousands of acres of lands that qualify for wilderness designation. The state should review the final plan when it is issued in November and if the final plan continues to de-value conservation, object to the plan during the objection process in early 2022. We urge the state to be an objector to this plan so that the Biden administration withdraws the current draft plan, which was issued under the Trump administration, and instead issues a new plan that proposes more wilderness, wild and scenic rivers, and wildlife protections.
  - **The Sierra National Forest:** Like the Sequoia National Forest, the draft plan, issued under the Trump administration, did not properly value the wilderness and

conservation values in this national forest. Indeed, the Trump-era forest plan amendment contains zero acres of proposed wilderness. Therefore, we urge the state to object to the final plan and ask the Biden administration to withdraw this plan and issue a new plan that proposes wilderness, wild and scenic rivers, and wildlife protections.

- **The Klamath National Forest:** The Forest Service will start this plan revision later this year with a forest assessment, wilderness inventory, and wild and scenic river inventory. We urge the state to engage actively in the planning process and provide comments urging more wilderness and wildlife protections.
- **The Mendocino National Forest:** The Forest Service will start this plan revision later this year with a forest assessment, wilderness inventory, and wild and scenic river inventory. This forest plan includes the Berryessa Snow Mountain National Monument and areas included in S. 1459, which is already supported by the state. We urge the state to engage in the planning process and provide comments urging increased land protections.
- **The Shasta Trinity National Forest and the Six Rivers National Forest:** The Forest Service will start the plan revision process for both national forests later this year with a forest assessment, wilderness inventory, and wild and scenic river inventory. Much of these two forests are proposed in S. 1459 as proposed restoration areas, wilderness, or wild rivers. We urge the state to engage in the planning process and provide comments urging increased land protections.
- **The Northern California Integrated Plan (NCIP):** Scoping for the BLM's NCIP starts in the fall. We urge the state to engage in the planning process and to promote the following principles: 1) spare all remaining mature trees, 2) practice forestry designed to grow more big trees, 3) allow no new road construction, 4) use "good" fire as a management tool, and 5) work with Tribes on cultural burning. Conservationists are also proposing that areas of critical environmental concern be established in the region and that wilderness-quality lands and potential new wild and scenic rivers be protected in the NCIP process. Some of the lands and waters covered by the NCIP are included in S. 1459. In addition, the BLM lands within the NCIP are also a part of the overall Northwest Forest Plan framework.
- **Berryessa Snow Mountain National Monument:** The BLM and Forest Service are jointly managing the Berryessa Snow Mountain National Monument, but the BLM is developing a separate monument management plan from the Forest

Service. We urge the state to request that the BLM and Forest Service develop a joint unified plan for this monument and urge the federal agencies to work collaboratively with all partners.

- Oppose proposed projects on federal lands that would destroy critically important habitat or otherwise despoil areas that should be managed for conservation, equitable access, sustainable recreation, or other purposes more consistent with the 30x30 goals. For example, California should oppose the current proposed Oberon Solar Project and instead urge the BLM to require the project to comply with the DRECP, particularly the CMAs for the conservation of microphyll woodlands and wildlife connectivity. The proponent for this project, which is one of the first one to be permitted under the DRECP, has requested that those CMAs be changed to accommodate the project. If such a waiver is granted by the BLM, it would undercut the conservation commitments agreed to by the state, BLM, and other participants in that 10-year long collaborative process and may lead to further erosion of the DRECP's conservation benefits on public land. The state should also oppose the proposed open pit mining at Conglomerate Mesa, which would impact National Conservation Lands. The state should also oppose proposed energy development that imperils the Haiwee area south of Owens Lake. Both proposed projects are in Inyo County on lands sacred to local indigenous peoples and include Lands with Wilderness Characteristics.
- Work with federal and state agencies to prevent the leasing and permitting of additional oil and gas production off California's coast, in the San Joaquin Valley and other parts of the state. The state should work to reclaim and restore lands that have been diminished by irresponsibly managed oil and gas development. Fossil fuel extraction onshore and in state and federal waters, including new oil and gas leasing and permitting, is counterproductive to the stated climate goals of Executive Order N-82-20. As we have seen in the past and with the most recent oil spill in Southern California that is despoiling beaches, wetlands, and estuaries in Orange County, fossil fuel development poses an immediate threat to the health and well-being of millions of Californians as well as to the local wildlife and ecosystems this process seeks to protect. If California is serious about protecting our state from the worst impacts of climate change and using land conservation to reduce climate impacts, state agencies should end devastating fossil fuel extraction occurring in state and federal waters, on state and privately-owned lands within the San Joaquin Valley and elsewhere. Instead, the state should work with impacted communities to permanently conserve lands for habitat or community space. In recent years, the BLM has offered over a million acres of lands and mineral estates within the Bakersfield Management Area for federal oil and gas leasing and more than 725,000 acres in the Central Coast planning area. Countless more acres of state- and privately-owned land has already been developed or set aside for future oil and gas development,

especially in areas like Kern County. The state should be plugging these wells to prevent leaks of methane and other pollutants. Restoring these lands for conservation purposes is a win-win for the climate and local communities who often lack access to open space. It would also help provide jobs and encourage a just transition for the region's oil and gas workers.

#### **IV. California can directly contribute to 30x30 through state public lands.**

While the state can influence federal public land decisions but must rely on either Congressional action or federal agency action, the state has direct control over its *own* public lands – either through management decisions or funding decisions. The state can contribute to the 30x30 goals by increasing the number of acres in parks and areas managed for conservation through direct acquisition or management decisions. California's state park system also plays a critical role in connecting underserved communities with nature. We urge the state to ensure that its efforts are consistent with existing large-scale land conservation plans (e.g., Habitat Conservation Plans, RCISs, NCCPs, the DRECP Biological Conservation Framework, and the California Essential Habitat Connectivity Project). The following are specific recommendations to increase conservation and equity on state lands.

- a. The state should prioritize conservation on state lands, including the management of state lands to exclude destructive uses such as commercial logging, mining, grazing, and oil and gas development.** The recent agreement between Governor Newsom and the California Legislature to protect Tesla Park by not opening it up to Off Highway Vehicle (OHV) use is an example of how California can protect its important natural resource lands. We are thankful to the governor and the legislature for reaching this agreement to protect Tesla Park. We urge the state to look for other opportunities to manage for increased, and more permanent, conservation on state lands, including the following:
  - i. CAL FIRE:** CAL FIRE: 72,000 acres of state public land are managed by CalFire as demonstration forests. These forest lands are primarily managed for continuous timber production and to provide research and demonstration opportunities on timberland management. Board of Forestry policy identifies timber production as the primary land use in most State Forests while public recreation is considered a secondary but compatible use. State Forest Policy should be updated to meet the needs of modern public lands management objectives and values. These co-equal goals should include watershed protection, research and demonstration of environmental restoration practices including prescribed fire, equitable recreation access, protection of old-growth trees and endangered species, research and demonstration of climate change mitigation strategies, environmental education, sustainable harvest of

minor forest products by the public, and research of sustained yield timber production. Investments should be made in the state forest system to make it less reliant on timber production for revenue while accelerating efforts to research and assess nature-based solutions.

- ii. **State Parks:** The State Vehicular Recreation Areas, or SVRAs, are OHV parks operated by the Off Highway Motor Vehicle and Recreation Division of California State Parks. State Parks can change how it is managing these lands. Oceana Dunes SVRA provides critical habitat for western snowy plover and least tern. The state should support the California Coastal Commission decision to amend the permit for the Oceano Dunes SVRA to phase out OHV use over the next three years. OHV use is not consistent with local coastal programs and the ongoing harm caused by OHV use is unlawful under the California Coastal Act. In addition, State Parks should require that state park management plan updates ensure that management is consistent with and promotes conservation instead of destruction of natural resources. For example, Red Rocks Canyon State Park is currently undergoing a management plan update. This update should include increased restrictions on the rampant OHV use that threatens the natural and cultural resources of this state park and adjacent BLM lands.
- iii. **State Lands Commission:** The SLC manages millions of acres of Public Trust and hundreds of thousands of acres of state school lands, including four million acres of tidal and submerged lands and the beds of natural navigable rivers, streams, lakes, bays, estuaries, inlets, and straits. Although the recent SLC strategic plan includes several critical steps forward on climate and equity, SLC still has work to do to improve its land management to prioritize conservation. For example, after abandoning a proposal to log the area in the face of public protest, there has been ongoing neglect of the SLC parcels at Hamms Pass in Mendocino County where trespass OHV use and cannabis growing are a continuing problem. SLC also needs to finish the state lands exchange with BLM in the California desert and look for other state land exchanges to further 30x30 goals. In addition, the SLC needs to review its surface and subsurface mineral rights program to identify opportunities to consolidate split estates and reduce conflicts between conserved lands and subsurface mineral exploration. The SLC should also conduct a rigorous assessment of potential land exchanges to further the 30x30 goal, including consolidating parcels within lands designated for conservation. Finally, SLC needs to resolve the uncertain future of the more than 400,000 acres of State School Lands in the Mojave Desert and elsewhere by finding solutions for the

long-term ownership of these parcels that conserves them to the maximum extent possible, especially where they exist as inholdings surrounded by public lands.

- iv. **DFW:** The system of state Ecological Areas and Wildlife Areas are already permanently conserved and are supposed to be managed for conservation. However, as noted by DFW's own Service Based Budget effort, these lands need additional investment in ongoing management and monitoring to ensure that they are providing the intended conservation benefits over the long-term. We urge the state to continue to increase funding for management and monitoring of these important conservation lands.

- b. **The state should look for other opportunities to create new state parks, wilderness, wildlife areas, and ecological reserves, and to expand existing state parks, wildlife areas, and ecological reserves.** This will require increased investment in funding land acquisitions, and increased efforts to partner with local communities, community-based organizations, land trusts, non-profit organizations, Tribes, and other interested parties to identify new opportunities that benefit communities and wildlife. The state should also abandon a pre-existing state position that prohibits State Parks from expanding. For example, for more than a decade, State Parks has failed to acquire and incorporate additional land in the state park system, even the lands designated a priority by the State Park's General Plan. We urge State Parks to change that position and begin to work with partners to accept new lands into the state parks system. We acknowledge and thank Governor Newsom for his signature of Senate Bill (SB) 266, authored by Senator Josh Newman, that requires State Parks to incorporate three parcels of land, about 1,500 acres, into Chino Hills State Park. California also can utilize the California Wilderness Act to create new State Wilderness areas either through action by the state legislature or the State Park and Recreation Commission. There are twelve California State Wildernesses within state parks, totaling almost 750 square miles. We also urge the state to address access gaps to state parks, such as improving transportation access and reducing fees for underrepresented communities.
- c. **The state should look at new categories of designated conserved lands such as the creation of a network of "climate reserves" and "wildlife corridors."** This might require new state legislation to authorize the designation of "climate reserves" and "wildlife corridors" and outline the standards for such designations and the protections afforded to those designations.

- d. The state should conduct a wilderness inventory of all its non-park lands (inventories are already required when a park general plan is developed).**

**V. Fuels management must further, not inhibit 30x30 goals.**

It is critical that the state incorporate 30x30 goals into its strategic wildfire planning efforts throughout the state to help re-establish mixed severity fire as an ecological process on public and private lands. We are encouraged by California's unprecedented funding provisions that address California's wildfire challenges in the approved 2021-22 budget. However, we believe the state must focus on better protections for important lands. California's vegetation evolved in concert with natural fire frequencies, and those frequencies – the fire return intervals – are out of balance in some ecosystems, which has resulted in the catastrophic fires we are seeing today. The fire return interval is too long in many conifer forests of the Sierra Nevada and North Coast ranges and too short in many of the shrublands of coastal Central and Southern California. In general, there is too little beneficial fire (i.e., prescribed, or managed fire) in the Sierra Nevada and too much fire along our central coasts and southern coasts and interior.

To restore balance, we must improve how we manage our forests with a priority placed on managed wildfire when possible and the use of prescribed fire when and where appropriate to enhance our state's rich native biodiversity and protect our watersheds. We also must continue to invest in permanent conservation of forest ecosystems, in which we are working to recreate more natural structure, including bigger, older, and more fire-resistant trees.

As noted in Section II above, Tribes play a critical role in leading efforts around sustainable fuels management and forest resilience on their ancestral lands, but the state needs to make necessary further investments to support programs on the need for prescribed burns and to support capacity building for Tribes and facilities at Tribes.

In many shrubland habitats, wildfire is too frequent, and the solutions must be different. Frequent fires can result in type conversion of shrublands, through which recurring fires kill certain shrub species before they can reproduce. Chaparral and shrubland habitats are then replaced with quick-drying, non-native, invasive, annual plants. This exacerbates the cycle of too-frequent fires, as the resulting system is more easily ignited and will burn repeatedly, ultimately resulting in type-conversion of California native plant communities to non-native plant communities.

California's Wildfire and Forest Resilience Action Plan explains that "California's diverse landscapes and communities require regionally tailored strategies and actions. Protecting California's communities and natural places from the impacts of catastrophic wildfire cannot be achieved through a 'one size fits all' solution." Wildfire related budget appropriations and policies should reflect this tailored approach.

To get the right solutions in the right place, we recommend that CAL FIRE use funds for fuel management actions in chaparral and shrubland habitats, especially those in Southern and coastal Central California, that do not result in type conversion of habitat and that avoid old-growth chaparral (greater than 50 years old) to the greatest extent possible to protect biodiversity. Research shows that vegetation management practices like mastication, burning, and thinning in Southern and coastal Central California habitats cause type conversion, increasing rather than decreasing fire risk.

We are deeply concerned that with an influx of new funding CAL FIRE will ramp up its common practices -- mastication, thinning, and burning – on public lands in habitats, like southern California chaparral, where these management actions will cause serious ecological damage with little fire prevention benefit.

Further, fuel breaks, especially those remote from development, are often harmful to chaparral habitats. Fuel breaks, as defined in the CAL FIRE Vegetation Treatment Program, include those sited in remote areas. Fuel break projects far from communities will do little to halt the spread of many of our state's most destructive wildfires in the future, many of which will be wind driven. A fire that can jump a 10-lane highway can easily jump a 200-foot fuel break. Many of these projects go against the best science, may increase fire danger, and will not affect the spread of wind-driven fires, which are responsible for some of the most catastrophic losses over the past decade.

#### **IV. Wildlife connectivity is vital to ensuring that public lands meet 30x30 goals.**

The state should incorporate wildlife connectivity in its 30x30 strategy by establishing a statewide network of conservation areas that seamlessly connect landscapes managed by state, private, Tribal, and federal entities.

To effectively address climate change impacts and threats to biodiversity, recent international efforts and research recommends strategically conserving a percentage of lands and waters in a network of intact lands and waters. The concept of 30x30 stems from an increasing body of research finding that to stabilize the climate and avoid permanent loss of biodiversity, we will need to significantly reduce land conversion to protect those areas that provide habitat for native species and sequester carbon. Though variance in expert opinion exists regarding what lands should be prioritized and the stringency of protections necessary to achieve ecological benefits, conservation scientists are united in the understanding that efforts should attempt to link conservation areas into a connected network.

To realistically promote a statewide connected network of conserved lands, the State must integrate public lands in its strategy. Though states lack legal authority over the management of federal public lands, the State can still have a significant influence on management and policy decisions by actively promoting conservation and sustainable stewardship in the following ways:



- **The State should identify and map locations of species' migration and dispersal patterns that are at risk from habitat fragmentation or barriers to movement. To make landscapes climate resilient, connectivity should be designed to specifically facilitate animal and plant movement in response to climate change.** In identifying critical linkages and core habitat for wildlife and vegetation (e.g., Joshua trees, coastal wetlands), the State should work with Tribes, relevant state and federal agencies, land trusts, and local government, to delineate a continuous network of protected areas and assess existing and potential opportunities to collaborate with and enter into joint power agreements, where appropriate.
- **The State should support the passage of federal legislation that enhances wildlife agency funding for conservation programs and promotes the protection of critical linkages on federal, state, and private lands.** Specifically, the State should support the [proposed Recovering America's Wildlife Act that funds the implementation of State Wildlife Action Plans](#), has bipartisan support, and provides funding to state agencies to enhance coordination and protect biodiversity. In addition, the proposed [Wildlife Corridor Conservation Act](#) and [Tribal Wildlife Corridors Act](#) would provide funding to conserve and restore habitats that facilitate the movement of wildlife that may be at risk due to habitat loss or fragmentation.
- **The State should advance legislation that creates a Wildlife Connectivity Action Plan that includes the following:**
  - An assessment of areas that builds upon DFW's Essential Habitat Connectivity Project, the California Wildlife Action Plan, and regional assessments. This assessment is important to identify and protect areas essential to fish and wildlife movement and habitat connectivity and threatened by climate change impacts, transportation infrastructure, new residential, commercial, and industrial development, and other human caused barriers.
  - Data on wildlife-vehicle collisions recorded by California Highway Patrol, California Department of Transportation (CalTrans), DFW, Tribes, and other entities.
  - A list of wildlife passage projects where the implementation of wildlife passage features, such as wildlife overpasses, underpasses, culverts, and directional fencing, would reduce wildlife-vehicle collisions and enhance habitat connectivity.
- **The CalTrans and the High-Speed Rail Authority should incorporate fish and wildlife movement in its project design.** Accommodations for wildlife movement should be required for any culverts and bridge replacements that occur on roadways that the [DFW has identified as a priority barrier to wildlife movement](#), fragment core habitats, or impose barriers in areas that provide important linkages for fish and wildlife

movement. In addition, recently enacted federal legislation directs funding to CalTrans for the protection of wildlife corridors to minimize wildlife-vehicle collisions and to enhance wildlife movement. CalTrans should be spending this funding consistent with the existing assessments identified above (e.g., DFW’s Essential Habitat Connectivity Project) and with future identified wildlife corridors.

- **The State should support federal and state partnerships that seek to protect critical linkages through protective designations and constructing wildlife crossings.** Several ongoing projects throughout the State, including [Liberty Canyon on Hwy 101](#), [Mammoth Crossings on Hwy 395](#), and [Pacheco Pass on SR 152](#), are critical for reducing wildlife-vehicle collisions and connecting habitat, and are supported by diverse partnerships. However, these projects are often hindered due to a lack of institutional and financial support.

**VI. Increased state and federal funding for public lands and waters is essential for 30x30 success.**

- a. The State should increase funding for acquisition, restoration, and management of public lands and waters.**

California should direct new and increased funding to state conservancies, the Wildlife Conservation Board (WCB), and other agencies to support acquisition of lands to create and expand California’s network of public lands and for restoration projects and ongoing management on state and federal lands. For example, the state should significantly increase funding for climate resilience/30x30 projects such as Salton Sea restoration, San Francisco Bay Salt Pond Restoration Project and other ongoing wetlands restoration projects, and restoration of ephemeral lakes in Tulare County that serve to provide high quality recreation and access for traditionally underserved communities. Much of this work will be on public lands and could add to the state’s 30x30 goals. In addition, the state should fund current partnerships/efforts to remove obsolete dams such as the Matilija, Klamath, and Potter Valley dams, and look for other opportunities to remove outdated dams and water diversions, restoring natural streamflow and function. Finally, the state should expand grant programs for restoration on public lands, including DFW’s Cannabis Restoration Grant Program.

The state should also look for new and more stable funding sources for this work. Past bonds have provided important funding for land conservation. However, funding for land acquisition, restoration and management has been unstable, intermittent, and largely “feast or famine.” It is difficult to achieve 30x30 goals without stable, substantial, and reliable funding. Given this challenge, we urge you to combine the 30x30 Pathways Report with new and substantial ongoing state investments in conservation. Further, with the current budget surplus, California should jump start its efforts to achieve the 30x30 goal with increased and/or new ongoing and

permanent state funding for conservation. We were pleased to see significant funding for conservation and improved equitable access to nature in the final budget agreements that we anticipate will be signed into law. However, the need for funding for acquisitions, restoration and capacity remains significant and will be necessary beyond the three-year budget agreement. We urge the state to allocate additional funding in each annual state budget to meet the 30x30 goals. We also urge the state to support putting a new Climate Resilience Bond on the November 2022 ballot. This funding could be used to leverage federal funding such as Land and Water Conservation Fund (LWCF) monies and Section 6 funding from the U.S. Fish and Wildlife Service.

We also urge the state to look at opportunities to support regional conservation efforts that will benefit public land. For example, Assembly Bill (AB 1183), authored by Assemblymember James Ramos, would create a new desert conservation program within the WCB, which will provide funding opportunities on state and federal lands in the California desert. We thank Governor Newsom for signing AB 1183 into law and urge him to provide funding for this program. Finally, we urge the state to ensure that state OHV funds spent to restore federal and state lands impacted by illegal OHV use are managed to ensure that the restoration investments last over the long-term and are not compromised by continued illegal OHV use. State Parks is currently reviewing the OHV grant program to ensure that the millions of dollars of state OHV funds granted to the BLM are providing the intended restoration benefits over the long-term. We encourage State Parks to revise its grant reporting requirements to ensure that those funds are producing the intended conservation outcomes on federal land.

**b. The State should advocate for increased federal funding for public lands.**

California should urge the Biden administration to ask for, and Congress to appropriate, increased funding levels for the federal land management agencies that will enable them to better manage and protect California's federal public lands and waters and provide for equitable access and well-planned, and sustainable recreation. For example, California should be advocating for increased federal funding for cleaning up illegal cannabis cultivation on public lands and increased funding for forest restoration on Forest Service lands. In addition, the state should support funding for federal land agencies' deferred maintenance backlog that vastly exceeds resources provided in the Great American Outdoors Act. The state should also look for opportunities to partner on improvements and facilities to make them more accessible and welcoming to underrepresented communities. Finally, California should work with the federal agencies to secure increased LWCF monies as well as work with the DOD on opportunities to secure Readiness and Environmental Protection Integration funding. We applaud the Office of Planning and Research's leadership and participation with other state and federal agencies and NGO partners in applying for designation of a "Sand to Sea" Sentinel Landscape. We urge the state to look for other opportunities to replicate these kinds of partnerships to leverage federal funding for conservation on public lands.

**VII. The state should prioritize inholding acquisitions.**

California should identify and prioritize willing-seller acquisitions of inholdings and then direct state funding to accomplish this outcome. In particular, the state should develop a comprehensive strategy, using all available tools and funding, to acquire inholdings to support large, connected landscapes. In addition, the state needs to build acquisition funding into its own agency plans, including securing LWCF money that could be incorporated into refuge expansion. Further, the SLC must prioritize land transfers of state-owned inholdings to consolidate important protected federal lands. Finally, the state should look at ensuring that WCB requirements for the transfer of lands acquired by WCB funds to federal agencies are achieving the intended results in a timely and efficient manner.

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California's 30x30 effort is an exciting opportunity to demonstrate how we can conserve our important public lands and waters and provide increased equitable access to nature for communities. We stand ready to work with the state to achieve these important goals as described above, and through new opportunities on state and federal public lands. Thank you for the opportunity to provide our recommendations.

Sincerely,

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