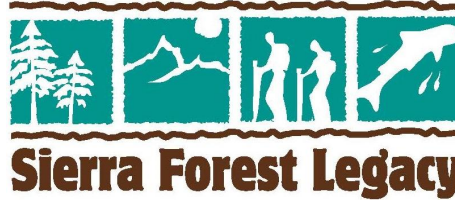
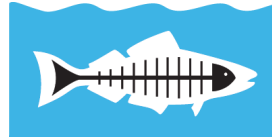


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February 15, 2022

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

Re: Comments on the Draft 30x30 Pathways Report

Dear Deputy Secretary Norris:

On behalf of the undersigned organizations, we are writing to provide comments on the draft Pathways to 30x30 Report (Pathways Report). These comments are in addition to the letters sent prior to the release of this draft in which we detailed our expectations regarding what should be in the Pathways Report.

Our organizations strongly support Governor Newsom's executive order on climate and biodiversity (EO N-82-20) in which he commits to protect California's biodiversity, expand equitable access to nature's benefits, and conserve places that help California achieve climate resilience and/or carbon neutrality.

We believe the draft Pathways Report is a great first step in the broader effort to fulfill the Governor's executive order. We appreciate the California Natural Resource Agency (CNRA)'s acknowledgment that current state conservation policy must adapt to California's climate challenges and social inequities. We were pleased to see this report focus on the need to protect biodiversity and equity as key components to providing climate resiliency and ensuring a future in which all Californians directly benefit from nature. We also appreciated the report's emphasis on community and tribal engagement.

We appreciate the state acknowledging the inequitable distribution of conserved lands. By prioritizing investments in climate vulnerable communities, 30x30 provides California with an opportunity to address some of the historic and ongoing conservation practices that have led to the inequitable distribution of high-quality nature spaces. For example, historical and ongoing practices of redlining, inequitable land-use decisions, and disinvestment have segregated communities of color from accessing green spaces and enjoying the benefits of nature. Moreover, toxic pollution from industrial and agricultural sources have disproportionately impacted these communities, making them more susceptible to chronic illnesses and more vulnerable to climate change, among other threats. As part of this effort, we should meaningfully include local communities as equal partners in the development and implementation of conservation projects, including restoration and stewardship.

The 30x30 effort is rooted in the recommendation from the international science community that we must protect 50 percent of our world's lands and waters by 2050 if we are going to have any hope of avoiding the worst impacts from climate change and reversing the extinction crisis. Thus, the goal

of conserving 30 percent of California's lands and waters by 2030 is only an interim goal. The state should acknowledge 30x30 as an interim goal to achieve the longer term 50 percent conservation goal, and we hope that the final Pathways Report will speak to how we will build off of this interim goal.

In addition, completion of the Pathways Report is just the beginning of the state's effort and not the end. As discussed below, we strongly urge that the Pathways Report be accompanied by an implementation plan. We also urge the state to look at identifying and funding a set of projects that meet biodiversity, equity and climate goals as a way to "kick off" the 30x30 effort.

While the Pathways Report has many important aspirational goals, the report needs additional work to ensure that these aspirations become a reality. The recommendations below are intended to result in a strong final Pathways Report that will ensure that the state will meet its goal of conserving 30 percent of lands and waters by 2030 in a manner that meaningfully advances biodiversity protection, equity, and climate resilience.

Finally, the recommendations below are focused on the main draft of the Pathways Report and do not include specific recommendations for Appendix A (Regional Opportunities) and Appendix B (Existing Conservation Plans). Many of the undersigned organizations will be individually and collectively providing regional comments to inform a final version of Appendices A and B. We note that the document is missing key appendices that will dictate the success of the conservation elements of the plan, including key research to document the biodiversity of this surprisingly undocumented global biodiversity hotspot.

30x30 is an opportunity to align ongoing state policy and actions, eliminate inconsistencies, and support synergies across other programs and initiatives. While the draft Pathways Report discusses the 30x30 effort as a part of the three key objectives set forth in EO N-82-20 (biodiversity, climate, and equity) along with the need to meet other state goals regarding housing and economic security, we do not believe that the state intends for the 30x30 effort to be the ultimate solution for achieving all the state's goals – climate, biodiversity, equity, housing, and economic security – given its existing and planned programmatic efforts. Instead, as noted in the 30x30 Advisory Committee meeting on January 12th, these lands and waters are "core" conservation areas – targeted because they will provide a backbone for keeping our ecosystems functioning due to their biodiversity value -- but are nested within a matrix of lands and waters that also provide important attributes that contribute to the state's other initiatives (e.g., Outdoors for All, Urban Greening Program, Tribal Engagement, Climate Smart Lands Strategy, etc.). Therefore, while biodiversity protection can provide climate resilience and often carbon sequestration and other climate goals, it is important for 30x30 to lead with biodiversity protection and acknowledge that not every acre of land and water conserved as part of 30x30 must also sequester carbon or provide climate adaptation or mitigation. This should be stated clearly and prominently in the Pathways Strategy.

E.O. N-82-20 states that the goal to conserve 30 percent of California's lands and waters by 2030 is "[t]o support the global effort to combat the biodiversity and climate crisis." To that end, the executive order directs state agencies to develop strategies to achieve the 30x30 goal "in a manner that . . . [p]rotects and restores biodiversity," "[b]uilds climate resilience" and "[e]xpands outdoor

access and recreation for all Californians.” The final report should provide more explicit articulation of how each of these goals, like increasing access to healthy and resilient green spaces, intersect with the 30x30 goal, as well as other CNRA programs that intersect with the strategies outlined in the report. For the purposes of these efforts, “access” and “equitable access” should be defined on multiple dimensions.¹ As part of the effort to connect the various programs, the final report should delineate whether and how progress in one program, such as 30x30, would also be counted as progress in another program, such as the Outdoors for All initiative or the Climate Smart Lands Strategy. Furthermore, we urge CNRA to identify other state programs and actions that exacerbate environmental burdens or harms and may potentially limit the success of 30x30 goals.

More Clarity is Needed on Other Effective Area-Based Conservation Measures (OECMs).

While access to conserved lands and waters is critically important, access must be balanced with the management needs to achieve the biodiversity conservation outcomes for which those lands and water were conserved. The Pathways Report starts to grapple with how to define this matrix of different lands and water with different management outcomes in its discussion of “Other Effective Area-Based Conservation Measures” (OECMs). Unfortunately, the draft report falls short of providing the necessary clarity as to what actions could be counted towards the 30x30 goal and what actions would not count but could be beneficial to 30x30 areas and fulfill other important goals (e.g., equity, recreational access, climate adaptation, etc.). We recommend that the final Pathways Report detail its approach to OECMs. That approach should be based on the International Union for Conservation of Nature and Convention on Biological Diversity definition and criteria. To qualify, conservation measures must be effective in protecting and restoring biodiversity and associated ecosystems, not be temporary or short-term. Moreover, long-term monitoring with periodic reviews is needed in order to assess continued effectiveness.²

Retain and Reinforce a Clear and Strong Definition of Conservation. We strongly support the Pathways Report’s definition of conservation. A strong and clear definition is essential to (1) understand the baseline of what lands and waters are already conserved and (2) set parameters around what is expected for the addition of new lands and waters to meet the 30x30 goal. The current definition should be further improved by clarifying the specific management outcomes for conserved lands and waters and how those outcomes will provide for biodiversity conservation over the long term (e.g., strong and ongoing management). The Pathways Report includes on page 30 a discussion of lands managed for conservation over the long term as an “example” of conservation. However, this should not be an example, but instead a minimum requirement of what is considered conserved. Further, the definition should clarify that protections created through administrative action would be considered enduring – and thus meet the definition of conservation – only if those protections are permanent or ongoing without any end point. Lands and waters protected by administrative actions that are time limited management decisions reversible by administrative

¹ These multiple dimensions include but are not limited to: physical access, financial, quality of experience and programming, meaningful participation in land use decisions and stewardship, preserving sacred sites and heritage, etc. This includes programming and accommodations appropriate to the site for trailheads, viewing areas, and similar low impact improvements which provide access to sites funded by 30x30 (Hispanic Access Foundation Infographic (2022): “What Is Access and What Makes it Equitable?” Link:

https://drive.google.com/file/d/165ocGXQp5cbSxG-tswKaec2C_YTg3FAD/view?usp=sharing

² A full list of criteria can be found: <https://www.nrdc.org/sites/default/files/nopc-oecm-letter-20211214.pdf>.

reconsideration or redesignation should not be considered “conserved” for purposes of 30x30. Additionally, the definition should include an explicit goal to sustain biodiversity. Moreover, the Pathways Report should explicitly state that restoration actions are included in this definition and emphasize that geographies with highly degraded landscapes and natural resources (e.g., gravel extraction sites, fallowed agricultural lands and oil extraction properties) have viable opportunities for conservation and restoration efforts. Criteria and metrics must adequately capture the equity values of lands suitable for restoration of biodiversity at or in proximity to climate vulnerable communities. Finally, as discussed above, there needs to be greater clarity around what OECMs would meet the definition of conservation and what would not. Many of the OECMs cited in the report lack suitable durability or biodiversity protections to meaningfully contribute to 30x30, but point to the need for a “yes, and” strategy of comprehensive and enduring land protection and management focused on biodiversity conservation yet to be articulated by the state.

Acquisition of lands and waterways is essential to achieving 30x30, but increasing the protection status of public lands will also be key. Thousands of species make their homes in regional parks, water district lands, and recreational areas visited by millions of people each year. These lands could be provided a pathway for inclusion in the 30x30 network if the state articulated clear criteria for managing biodiversity protections as a primary purpose and incentivized durable protection, monitoring of biodiversity and recreation, and priority access to restoration funding for these areas. Effective expansion of access and biodiversity through the 30x30 lens should mean prioritizing GAP 1, GAP 2, and other durable environmental protections in areas that are accessible for climate vulnerable communities, as determined by each region. CNRA must work in partnership with communities to identify and prioritize opportunities for acquiring and/or restoring lands and water as an overall agency priority. CNRA can further act to remove administrative, financial, and policy barriers to increasing protections and acquiring land to benefit these communities. The recommendations of the August 3 2021 “Advancing 30x30: Conservation of Lands Advisory Panel Summary Document” further expand on these points.

The Factors for Prioritizing Lands and Waters to Meet the 30x30 Goal Need to Include Metrics for Biodiversity Protection, Climate Resilience, and Equity and Human Needs. As noted above we support CNRA’s definition of conservation, with recommended clarifications. We request the final Pathways Report provide more clarity around what factors and metrics should be considered when assessing investments into lands and waters to meet the 30x30 goal.

The current report discusses a “spectrum of conservation approaches” that must be clarified to ensure that commitments to manage lands to support thriving biodiversity while also allowing for recreation, agriculture, and cultural uses³ (when those activities are compatible with sustaining

³ We wish to clarify that conserved lands should allow for the rights of California’s Native American Tribes to practice their traditional hunting, gathering and fishing rights. We also note that California laws and natural resource regulations as currently written obstruct these rights and that this criminalization impedes the ability of tribal members to practice and transmit cultural knowledge and to create culturally valued objects. There is a need to change these laws to recognize the rights of California’s Tribes to hunt, gather and fish. Additionally, Californian Tribes have difficulties gaining access to federal lands and can face criminalization for accessing their traditional cultural resources. Barriers to harvesting or other access of cultural resources (e.g., gates, closed roads, and requirements for obtaining permits) are compounded by inconsistent

biodiversity) are *real* (there is funding to conduct these commitments), *durable* (long-term) and *enforceable* (cannot be revoked with an administrative action or abandoned without repercussions). Clarification around what should be included in conservation prioritization should also result in including areas within already disturbed landscapes (either urban, suburban, or rural communities) and areas important to California's Native Tribes. Where consistent with the biodiversity protections for which the land has been conserved, preparation of resource management plans prior to siting of recreational trails, activities and uses is central to ensuring that recreation is compatible with biological values.

We recommend that potential areas for future inclusion in 30x30 should be run through a scoring matrix that includes criteria representing biodiversity protection and restoration such as habitat protection and connectivity with existing protected areas, climate resilience, equity and human needs (e.g., access to open space, dust control, water infiltration, and protection of cultural sites), and support for tribal ownership, management, and stewardship. Appendix A of this letter includes some examples of criteria that can be considered as a starting point. We recognize that each region in California has distinct needs and values and such a scoring matrix would need to gather extensive community input to further refine such a matrix. Candidate areas would ideally meet a minimum-score threshold in each area for both existing and restored biodiversity, be ranked by overall score, and have an associated data uncertainty/quality modifier to acknowledge data gaps. There should also be an overlay of management to ensure that lands conserved can meet their intended purpose. All 30x 30 lands should have long term biological value to ecosystems and species, in either their current or restored state.

30x30 Should Advance Equity. We appreciate that the state includes “[p]lacing justice, equity, diversity and inclusion at the center of planning, decision making and implementation” as one of three guiding principles. Funding structures involved in advancing the goals of 30x30 and Executive Order 82-20 should support equitable conservation outcomes for all regions of California. We also support the recommendations made in CNRA's Equity Advisory Panel Summary Document (June 2021), especially as they pertain to recommendations to increasing investments, project siting, and community resilience to communities most in need. We are also grateful that the Pathways to 30x30 report, as drafted, includes several proposed policies that indicate a shift to a framework that will aspire to achieve equitable benefits to climate-vulnerable communities, such as policies 1.1, 1.2, 6.5, 6.6, 8.1, 8.2, and 14.11. 30x30 should increase opportunities for restoration and conservation projects within and accessible to climate vulnerable communities to promote biodiversity, access, and climate resilience. Achieving equity through the 30x30 lens means prioritizing GAP 1 and GAP 2 lands accessible to or within climate vulnerable communities, as defined by each region. CNRA should also further act to remove administrative, financial, and policy barriers to increasing protections and acquiring land to benefit these communities. The state also should identify clear and accountable metrics to define success to ensure that this commitment towards equity goals is

co-management arrangements between tribes and federal land agencies. These barriers and complications combine to make gathering difficult. The federal *and state government* and its agencies have a trust responsibility to Tribes that includes protecting reserved rights to gather on lands now under federal or state jurisdiction. *We encourage CNRA to seek ways to work with Tribes, state agencies and federal land managers to promote access to federally and state managed lands for Tribes seeking to access traditional cultural resources and traditional gathering sites.*

implemented.

Prioritizing Investments in Climate Vulnerable Communities. As discussed above, the state should include overlap of biological benefits with equity needs as part of its consideration for what should be prioritized for biodiversity conservation to ensure that investments in 30x30 will include communities that have historically and currently lacked investment in efforts to restore and conserve natural areas. One aspirational approach may be to consider a specific funding set-aside, such as those used to implement numerous California state climate policies⁴ as an accountability mechanism to measure success, ensure timely benefits (e.g. climate resilience, public health, and increased biodiversity), and reduce barriers for historically marginalized racially and ethnically diverse communities across the state. So far, set-asides have supported increased competitiveness of less resourced small local governments and local NGOs, facilitated larger discussions pertaining to inequities in California funding mechanisms, reduced the time-lag for vulnerable communities to benefit from public funds, and have been proven as an effective funding mechanism to direct tangible benefits to vulnerable communities.

We encourage CNRA to consider a 50% investment set-aside for biodiversity conservation actions focused on climate vulnerable communities as one approach to ensure that communities who historically have seen little or no conservation investment have access to funding for the acquisition and/or restoration of lands and waters for conservation purposes. Different methodologies of applying this 50% funding set-aside should be considered so as to provide the program's intended biodiversity benefits across California's diverse geography. One example is that as 30x30 funds are allocated per CNRA region, 50% of the funds per region are allocated for biodiversity conservation actions within or accessible to climate vulnerable communities, as defined by each region. Accessible locations would include those urban, peri-urban, or rural locations frequently under the greatest threat of development and loss of biodiversity. We also recommend that state and Federal agencies coordinate to maximize these investments. We note that although the Pathways report uses the term "climate vulnerable community," it is unclear how the term is defined and how this definition would guide 30x30 implementation. We encourage CNRA to develop, with partner agencies, its own leadership and with the input of environmental justice and equity leaders a definition to guide this work, and to encourage the development of California jurisdictions to complete their statutory obligation to map climate vulnerability under SB 379. We offer suggestions to inform this definition

⁴ As examples for natural resource programming, CNRA's [Urban Greening Program](#) includes a 25 percent (25%) set-aside for "disadvantaged communities" in the state. Proposition 68 includes a set-aside of at least fifteen percent (15%) to benefit disadvantaged communities for the [Green Infrastructure Program](#). Proposition 1 includes a requirement that at least 25 percent (25%) of available funds in its [Urban Rivers Grant Program](#) be allocated for projects that serve disadvantaged communities. The [Transformative Climate Communities Program](#), which emphasizes place-based transformation, includes program guidelines that direct investments by requiring the program to be located in communities most burdened by environmental, socioeconomic, and health inequities. Whether through legislation or agency initiative, both established and new programs have integrated funding set asides and equity criteria that have yielded direct benefit for Californians throughout virtually every region of the state. Overall, set-asides have facilitated increased competitiveness of smaller, less resourced local governments, local NGOs, supported larger discussions pertaining to inequities in California funding mechanisms, reducing the time-lag for vulnerable communities to benefit from public funds, and have been proven as an effective funding mechanism to direct tangible benefits to vulnerable communities.

in *Appendix B*.

Family Supporting Jobs. As part of California’s commitment to phase out oil and gas drilling on California’s lands and waters, the state should include ensuring a transition to family supporting jobs as part of its 30x30 commitment. Moreover, this process should aim to create synergy with other efforts to expand high-road employment and training opportunities to enable community members to become direct stewards of their nearby environment. For example, 30x30 initiatives can provide community science, restoration, recreation, interpretation and land maintenance opportunities for youth, farmworkers, and workers currently employed by the fossil fuel industry and other harmful extractive processes such as logging. Biodiversity assessment and monitoring for 30x30 that applies NextGen technologies (e.g. DNA barcoding, automated sensors, machine learning) requires technicians with training but not degrees, creating innumerable entry level biotech jobs. Ecosystem services must also be monitored to track the outcome of conservation actions, to detect changing conditions, and to allow for adaptive management. By promoting job training opportunities and hiring community members, for careers in the field and the lab and the classroom, the 30x30 Pathways document can support family supporting jobs for community members to become direct stewards of their nearby environment. All of these new jobs can and should be structured so all Californians finally have the opportunity to participate, and to benefit.

Implement Policies that Support Tribal Stewardship and Management. We appreciate the draft Pathways Report includes “[c]onsulting and partnering with California Native American tribes” as one of three guiding principles and a commitment to Tribal partnerships. This commitment has been seen in action already through robust outreach by the California Natural Resources Agency’s government to government consultations, and tribal listening sessions.

There are 109 federally recognized tribal governments within California and dozens of non-federally recognized tribal communities. California’s tremendous biodiversity owes greatly to tribal stewardship, and many of our most biodiverse areas are also culturally important areas. 30x30 creates a fresh opportunity for Tribal Nations to collaborate with the State and other governments as managers and/or co-managers of working lands, watersheds, and coastal areas. New tribal intergovernmental and public/private partnerships can deploy 30x30 pathways to create the envisioned benefit stack: increased biodiversity, improved protection through conservation, prioritization of nature-based solutions, and expand “climate services” such as carbon sequestration, provided by our working lands and oceans. Importantly, 30x30 provides an opportunity to investigate and conduct land acquisition by tribal nations and the state, which may result in new tribal/state co-management structures. There is already tribal/state co-management of water quality, airsheds, forest lands, and park lands, and other resources, and 30x30 provides new strength to shift crucial ecosystems such as watersheds, salmon strongholds – often including tribal cultural resources - into perpetual conservation.

However, there is work needed to achieve these goals-- the report lacks specific recommendations and commitments to ensure that this commitment is fulfilled. For example, as discussed above, there should be funding specifically provided to support tribal engagement in 30x30 that supports increased consultation, greater capacity and resources for land stewardship, and the establishment and administration of tribally protected areas. The state should also include a commitment to

collaborate with tribes to create specific goals, objectives, and metrics for how 30x30 will respect and support tribal sovereignty, self-determination, and management and use of land for which they have historic connections. Part of ‘Enhancing Conservation’ should be an objective for meaningful co-management, including goal-setting, and not consultation after objectives have already been determined. In addition, there should be a specific directive in 30x30 to include land return as a mechanism to meet the 30x30 goal, and a policy path to allow for such transfers. Pathways to 30x30 should specifically explore State funding for an ambitious California Land Back commitment.

Support CDFW's Natural Community Conservation Planning (NCCP) program.

CDFW's Natural Community Conservation Planning (NCCP) program already engages numerous private and public partners that takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is science based and broader in its orientation and objectives than the California and Federal Endangered Species Acts as these laws are designed to identify and protect individual species that have already declined in number significantly, where NCCPs protect complex ecosystems in a regional context, embracing the protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. There are currently 17 approved NCCPs (includes 6 subarea plans) and more than nine NCCPs in various stages of planning (includes two subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. 30x30 should specifically support existing NCCPs and allocate funding for purchase and habitat enhancements of NCCP lands as well as research opportunities related to NCCP protected lands, water and species. NCCPs provide a clear and proven path to achieving the goals of the 30x30 program.

The “Evaluation of Conservation Outcomes” Strategy Needs to be Expanded into a More Holistic and Robust Science Strategy. The Pathways Report discusses the need to evaluate conservation outcomes and adaptively manage, but this is only one part of what is necessary to meet the state’s 30x30 goal. The decisions regarding where, how, and when to conserve lands and waters to achieve 30x30 goals and whether those actions are achieving the intended outcomes must be based on sound science and the application of the principles of conservation biology. The report currently fails to include a specific discussion on how to ensure critical decisions are based on sound science such as what lands and waters should be conserved (e.g., conservation priorities), the management objectives for these areas, how restoration should be conducted, and what defines success. The state lacks adequate data on below-ground biodiversity, soil fungi, plants, vegetation, and fish and wildlife. Additional research must also be supported to fill data gaps on the intersection of equity, biodiversity, and climate benefits such as carbon sequestration or buffering climate impacts. The Pathways Report strategy needs to include a significant new focus on generating this critical data sooner rather than later, including completing statewide fine-scale vegetation maps; All Taxa Biodiversity Inventories (ATBI) that provide information on what exists, where, and why; modeling for climate change; and gathering and interpreting community science. In addition, the CA Nature maps need to be further refined to include additional conserved areas such as preserves and other conservation easements. Finally, this section needs to include how the state will ensure that all landscape types – with a particular emphasis on under-represented landscapes, climate refugia and nuclei, freshwater and marine areas – are conserved. We support the Pathways Report’s identification

of existing programs, such as NCCPs, Habitat Conservation Plans (HCPs)s, and Regional Conservation Investment Strategies (RCISs), as “off the shelf” vehicles for early 30X30 implementation.

The reliance on modeled and self-reported data such as ACE and GAP status must be augmented by measured data on biodiversity, equity, access, and protection as well as climate resilience. We support the document’s recognition that conservation easements and acquisitions should be inventoried to ensure they are achieving goals as established, and believe expanding this effort to additional conservation areas and measures will move us from belief to knowledge.

Clear and Measurable Goals, Targets, and Metrics need to be established. In addition to the recommendation for clear and measurable equity and Tribal goals, the state needs to include metrics to demonstrate progress toward achieving the 30x30 goal by setting interim targets. In addition to providing interim acreage targets, the state needs to collaborate with scientists, land stewards, and managers in a transparent manner to identify metrics to measure whether conserved lands and waters are being managed over the long term to provide the benefits for which they were conserved (e.g., species conservation targets, benchmarks, and monitoring indicators), and to articulate the project’s co-benefits, who or what is expected to benefit, and avenues for correction if metrics are not met. Metrics should include, but not be limited to, increased acreage with durable environmental protections (GAP 1 or 2) overall and within or accessible to climate vulnerable communities, improved ecosystem services, overall funding allocation to climate vulnerable communities, increased public participation, improved public health, species health and increased habitat protection and biodiversity. We recommend that CNRA also develop a transparent process for screening these metrics, including the provision of a process for elevating concerns to the Agency and identifying strategies to repair any unintentional adverse impacts of 30x30 projects.

Acknowledging that factors and conditions affecting biodiversity must be prioritized, we also support robust community engagement to identify local priorities and nuance needed for successful and adaptive program implementation. Similar to metrics to inclusion in 30x30, monitoring biotic, abiotic, cultural, and compliance aspects will be essential to our investments being realized as intended. In order to achieve equity goals for 30x30 it will be necessary to structure metrics, scoring criteria so that restoration of biodiversity is prioritized in areas that lack access to nature and are consistent with sound science and the principles of conservation biology. Achieving a 30x30 goal will be an ongoing process that lives beyond the initial protection of an acre of land or mile of stream or river, particularly considering the impacts of climate change.

Freshwater Conservation Needs to be Explicitly Included. The Pathways Report needs to include a separate section on freshwater conservation that includes specific actions to protect freshwater water quality and quantity. The failure to consider the unique needs of freshwater ecosystems will limit the effectiveness of 30x30. We support the report’s inclusion of various actions identified within the nine strategies, including calling for designations of “outstanding natural resource waters,” but the report would benefit by pulling the water related actions into one separate strategy. We recommend the Pathways Report include the following actions to conserve freshwater ecosystems. First, the state should commit to establishing terrestrial-freshwater protected areas and management plans at the watershed scale. These protected areas should include strong protections for hotspots of freshwater biodiversity and/or ecosystem services such as meadows, riparian areas,

floodplains and waterways, watersheds that provide regional representation of species and habitats, and watersheds that are resilient to climate change. Second, there should be a commitment to remove non-functional dams, a moratorium on new dams and to restore connectivity of inland waters including restoring of impaired waterways, meadows, riparian areas, floodplains and wetlands. Third, the report should include a directive to protect, restore and manage for environmental flows – flows in rivers and streams necessary to sustain ecosystem health and services – together with minimum streamflow protection, requirements and enforcement, and permanent water dedications with fish and water habitat as beneficial uses. Fourth, there should be a commitment to control invasive species and protect water quality, including protecting cold-water sources and vegetated riparian corridors, as part of management actions. Finally, there is a need for restoration plans for struggling runs of native salmon in the Klamath, Sacramento, and Eel river basins.

Conservation of Marine Waters must be Science Based, Representative, and Include the Full Diversity of Ocean Users in Decision Making. We congratulate CNRA for recognizing that MPAs offer very different outcomes depending on their level of protection. Science shows that highly and fully protected marine protected areas (MPAs) provide the strongest protections for conserving biodiversity and ecosystem structure and function, and enhancing ecosystem resilience in the face of climate change.

While the Pathways Report asserts that California’s entire Marine Protected Area (MPA) network meets the state’s definition of “conserve,” the draft does not articulate science-based criteria or a framework to justify or explicate that decision. California’s MPA network offers a range of biodiversity protections that are a direct result of the level of protection (LOP) established for each MPA. The Marine Life Protection Act (MLPA) Master Plan clearly states that biodiversity outcomes depend on the level of protection individual MPAs confer. Given that the state’s MPA network includes LOPs ranging from “low” to “very-high” with corresponding expectations for biodiversity outcomes depending on the LOP, the state should conduct a science-based analysis before establishing the entire MPA network as conserved. This analysis should be part of the ongoing MLPA Decadal Management Review and should be conducted by a Science Advisory Team. We recommend the state apply a scientific framework such as the MPA Guide to evaluate the current MPA network and to inform necessary actions to achieve the objectives laid out in the 30x30 executive order.

As an avenue to achieve 30x30 marine protections, the Pathways Report proposes to strengthen protections within California’s existing National Marine Sanctuaries (NMS). The Report notes correctly that NMS, without additional conservation management actions, do not currently qualify as conserved and offers some ideas to strengthen protections within NMS such as vessel speed limits, action to improve water quality, and phasing out harmful fishing gear. We support these actions, yet note that any of these actions alone may not be sufficient to meet 30x30 objectives. According to the most recent National Marine Sanctuary condition reports, all California sanctuaries have suffered “measurable degradation in several aspects of ecological integrity.”⁵ More specifically, three of California’s four marine sanctuaries have seen measurable degradation in biodiversity in the past 15

⁵ Gittings, S.R., M. Tartt, and K. Broughton. 2013. National Marine Sanctuary System Condition Report 2013. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries, Silver Spring, MD. 33 pp. (URL <http://www.sanctuaries.noaa.gov/science/condition/>)

years.⁶ In order to strengthen protections in NMS to 30x30 standards, there needs to be additions to existing regulations to adequately protect marine biodiversity.

We urge CNRA to expand its geographic scope in identifying prospective areas for enhanced conservation. The state should look beyond NMS boundaries to identify opportunities for greater representation of habitat types and bioregions. Future marine sites should represent the diversity of California's ocean habitats and serve to advance equitable access to the ocean across the state's extensive coastline.

In its discussion of enhancing protections within NMS, the Pathways Report omits key ocean users and conservation organizations (e.g., ENGOs). The Report identifies government officials, California Native Tribes, scientists and fishers as stakeholders that will form a working group to identify strengthened protections within NMS to achieve 30x30. However, this list omits key ocean users that form the backbone of California's \$26.5 billion-dollar ocean tourism and recreation economy, as well as groups representing the millions of Californians who recreate and use our coastal areas regularly. Half of all Californians visit the coast each year, and the vast majority undertake non-consumptive activities like sightseeing, beach walking, and swimming.⁷ To advance the clearly stated equity goals in the Governor's 30x30 Executive Order, the state must consider proportionally the millions of ocean users who are not part of the fishing community. The final Pathways report should describe a plan for a fully representative group of ocean users and be accountable to all people who benefit from a healthy ocean.

Desert Mapping Boundaries Must be Corrected. As currently defined in the draft Pathway and previous 30x30 CNRA reports, the "Inland Desert Region" consists of Imperial County, eastern parts of Riverside, and most of San Bernardino County. At the outset, we note this definition presents a considerable obstacle to effective science-based land management, as from both ecological and Native cultural perspectives, the California desert does not align with the "Inland Deserts" borders defined by the CNRA. For example, based on CNRA's regional mapping in the Pathways draft report, Appendix A, 21% of the Sierra Nevada region is desert, which includes Death Valley; you would expect that area to be categorized in the Inland Desert region.

Unfortunately, current CNRA regional boundaries overlook a large portion of California desert lands and dismiss the fact that the desert accounts for 25% of the state.⁸ We urge the CNRA to adopt boundaries for the Inland Desert regions that are analogous to the California desert as shown in many existing maps and boundaries including those generated by the US Department of Agriculture, the US Environmental Protection Agency and the US Bureau of Land Management for the "California Desert Conservation Area" (*Appendix C*). We feel that effective stewardship of wildlife connectivity, air quality, cultural resources, and similar issues warrant consideration of a

⁶ Ibid

⁷

<https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2021-12/California%20Recreation%20Report%20v8-final%20for%20web.pdf?fv=okNTH>.

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<https://www.newworldencyclopedia.org/entry/california#:~:text=Deserts%20in%20California%20make%20up,the%20Mojave%20lies%20Death%20Valley>.

larger desert region. Not doing so will place state and federal agencies at odds with each other and as a result, may generate faulty scientific models and outcomes. Presumably, the state and local agencies will use these regional categories to create management prescriptions – furthering ill-informed and short-sighted prescriptions.

The Pathways Report Needs to Include Specific Actions regarding how Public Lands will contribute to the 30x30 goal. The Pathways Report has a strategy specific to existing public lands and waters and mentions the potential of adding new public lands through acquisitions as part of the strategy to execute strategic land acquisitions. However, the final report should be specific regarding opportunities for increasing protection for public lands, oceans and rivers through new designation, increased funding for management to advance climate, biodiversity and equity goals and acquiring inholdings to connect landscapes. With almost 50% of California under federal land management, federal public lands are critical to meet the state's 30x30 climate, equity and biodiversity goals. Durable designations (e.g., new wilderness, monuments, wild and scenic rivers, outstanding national resource waters, or other new areas of permanent protection) can significantly advance 30x30 objectives. The report should also call on federal land managers to identify critical wildlife habitat and corridors, recommending that joint plans be developed between federal managers and state agencies to ensure wildlife and biodiversity are protected from development and habitat fragmentation.

The most critical recommendation the state can make around public lands is to request that federal land managers support the state's 30x30 goals and ensure that management of the 47,797,533 million acres of federal public lands match the conservation standards of the state. It should call for the development of an agreement between California and federal land managers to manage lands to the state's 30x30 conservation standards even if more protective than federal recommendations.

The creation and funding of new state parks, wildlife management areas, and other state protected areas will also address biodiversity while providing equitable access and promoting its Climate Smart goals. In this regard, we note that CNRA received numerous suggestions for new federal and state designations, including [a letter specific to public lands that was sent by many of the undersigned organizations on October 8, 2021](#). The final Pathways document should list these recommendations as an appendix to the report.

The Regionally Led Conservation Strategy Should Be Expanded. As noted in the Pathways Report, land use planning and decisions have enormous impacts – positively and negatively – on conservation, climate resiliency, public health outcomes and equitable access to green space/open space. The report includes good recommendations but omits the Office of Planning and Research (OPR) as a key partner in the effort to promote strong policies and funding to incentivize land use planning and decisions that protect and restore important lands for biodiversity and climate resilience; increase opportunities for open space, parks, and greenways in park-poor areas; reduce communities' exposure to public health risks posed by toxic projects; and avoid fragmenting lands. In addition, the report needs to include recommendations specific to promoting strong local land use planning, including supporting new NCCPs, RCISs, and other locally driven conservation planning efforts that will be reflected in local land use decisions.

Equity research and needs assessments should also be conducted in each CNRA region to identify the barriers, opportunities, and local priorities for conservation sites. One example of a local needs assessment is the Central Valley 30x30 Community Needs Assessment, which is a partnership among Alianza Ecologista, Valley Forward, Sequoia Riverlands Trust, Audubon California, and the Central Valley Partnership that will conduct over one thousand community surveys to identify farmworker needs and priorities for 30x30 levels of land conservation accessible to their communities.

Commenting broadly on Appendix A of the Pathways draft, we also express concern on the inconsistencies and omission of regional priorities, which undercut equity across regionally led conservation efforts. We suggest that Appendix A of the Pathways draft include the following goals to support equity throughout all regions of California:

- Clean water and air
- Acknowledging the importance of all forms of knowledge acquisition, including academic, traditional ecological, experiential, etc.
- Nature and biodiversity conservation with appropriate access for all in climate vulnerable communities
- Authentic, reciprocal and meaningful sustained community engagement
- Leadership that is representative of the differing racial, ethnic and economic backgrounds throughout California
- Language access and equity--translation, interpretation and ADA accessibility
- Free or reduced park entrance fees
- Transportation to protected areas
- Increased river and coastal access
- Enhanced existing programs
- ADA accessibility

The Final Report Should Include a Clear Implementation Plan with a Governance Structure that is appropriately staffed, transparent, and accountable to the Governor, Legislature and Public. The Pathways Report does not include a clear roadmap for implementation. Instead, it appears to rely on the California Biodiversity Collaborative and use of CA Nature. However, CA Nature is only a collection of datasets and to-be-completed decision support tools that can be used by anyone. Further, the California Biodiversity Collaborative is not accountable to any specific decision-maker, not staffed specifically to conduct this strategy, and not transparent regarding decision-making. Therefore, in essence, the state's implementation plan appears to rest on the hope that federal, state, and local agencies, Tribes, and non-governmental organizations will take actions that will achieve 6 million acres of conservation, without the implementation process for doing so.

CNRA must identify timely solutions to barriers arising from 30x30 initiatives through public engagement and agency-wide equity needs assessment. For example, CNRA can advance equity by ensuring the policies approved in the 30x30 Pathways document eliminates barriers for engagement by tribes and other historically marginalized communities by providing funding sustained for meaningful engagement, including a process to provide stipends for community residents to participate.

The implementation path should use existing state agencies (e.g., Wildlife Conservation Board and Coastal Conservancy) as the fulcrum of 30x30 implementation. It is cost effective to use these agencies because they have the capacity and track record for achieving program goals and for making diverse investments that benefit a spectrum of communities and localities.

Another critical focus for implementation is responding to time-sensitive threats to existing biodiversity with early funding, such as land under threat of urban development, subdivision into estate lots, or even agricultural conversion. Many natural communities and species are already at the tipping point of extirpation and cannot tolerate further loss. These same areas are often the last hope for open space for communities. There is no time to spare in such situations.

The Newsom Administration should create a 30x30 Leadership Group, chaired by the Natural Resources Secretary, and include the Governor's office staff, CNRA's Assistant Secretary for Equity and Environmental Justice, Deputy Secretary for Biodiversity, Deputy Secretary for Access, and Assistant Secretary for Tribal Affairs, as well as heads of relevant state and federal departments, including California Department of Fish and Wildlife and regional heads of the U.S. Forest Service, Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (USFWS). The role of the Leadership Group is to facilitate coordination between and among relevant agencies and Administration staff at the highest levels. In addition, the Leadership Group should have a Policy Committee that includes the members of the Leadership Group (or their designees) and public members who represent Tribes, scientists, and community-based organizations and thought leaders with expertise in land use planning, biodiversity conservation, and equity and environmental justice issues. These public members should hold defined roles and responsibilities to facilitate meaningful participation. The Policy Committee's role is to operationalize the Leadership Group's policies while soliciting and incorporating public feedback.

Both the Leadership Group and the Policy Committee should convene in public meetings on a regular basis to ensure that the 30x30 goals are being met in a transparent and accountable manner and to resolve any barrier to those goals. These meetings should provide for public engagement. The Leadership Group and Policy Committee should be appropriately staffed and funded by the state. Further, this governance structure must include meaningful Tribal consultation and engagement. The Policy Committee should base its decisions on criteria publicly vetted with environmental justice and community-based organizations throughout the state, and include development and evaluation of equitable 30x30 programs. For example, a racial equity board resolution, similar to that of the [State Water Resources Control Board](#), could be adopted.

In addition to the governance structure, the implementation plan should include a timeline and measurable, actionable goals, targets and metrics, as discussed above. The Administration should report annually to the Legislature on how many acres have been conserved towards achieving a 30 percent goal; what, if any, barriers exist to achieving this goal by 2030; actions proposed to address those barriers; how many acres have been conserved within and accessible to climate vulnerable communities; and goals for the next year.

Community Engagement. CNRA must engage in robust community engagement, including advancing equity in the public process relating to 30x30 initiatives. We support increased language

equity and accessibility for meetings, establishment of regional and technical advisory committees, and requiring meaningful and reciprocal public engagement in project design and program administration. The current process of obtaining input through a “public feedback” element of statewide meetings is not meaningful community engagement. Moreover, any input collected should be clearly communicated back to communities as to whether or not it was included or why it was not included in all documents and plans throughout the process to create a feedback loop. A successful example of a community engagement process includes the SAFER Advisory Group or how the Transformative Climate Communities Program allows for community members to practice self-determination in designing and approving projects. We note that it is important for CNRA to develop a mechanism to compensate community leaders and residents for their time and expertise in these processes. While conducting outreach for community engagement, CNRA staff should be reflective of the local communities served and utilize trusted messengers and existing communication networks in the community as part of the process.

Capacity Building of Partners Must be Expanded. California cannot achieve its 30x30 goals without substantial engagement by a wide diversity of partners, including Tribes, environmental justice organizations, land trusts, environmental organizations, resource conservation districts, and state agencies. However, while some organizations are well-funded, many local organizations already working to engage communities in conservation, restoration and planning efforts, need additional capacity to meet the urgent demands of implementing 30x30. Additionally, most small community-based organizations are either volunteer-run or have extremely small budgets. These smaller community based organizations not only have the greatest need for capacity investments but are also the most valuable partners in making conservation actions a reality on the ground, and ensuring it is meaningful to communities. These organizations badly need investments in capacity to allow them to write and implement grants; execute legal agreements (e.g., acquisitions and easements, monitor and manage lands); formulate, design and implement community-based projects; and conduct scientific research and environmental education). Organizations submitted numerous letters with suggestions for the state to invest in capacity expansion, including investments to build up capacity for those partnerships; providing technical assistance pertaining to equity and conservation for local government and community partners; providing direct stipends to community-based organizations and community residents to compensate them for their time and expertise; grant programs which have fewer barriers for smaller community-based organizations; promoting re-granting opportunities for organizations who have connections with smaller, local organizations; and expanding programs such as the Regional Forest and Fire Capacity Program that promote partnerships and planning to include biodiversity conservation and climate resilience. The final Pathways Report should include more specific recommendations as to how the state will build capacity for these entities – e.g., including specific program recommendations and funding proposals.

There Should be a Strategy for Dedicated and Ongoing Funding to achieve the 30x30 goal and it should be incorporated into the implementation plan. We were pleased to see that the Pathways Report includes a strategy for aligning investments to maximize conservation benefits, including leveraging private funding and existing state and federal funding. At minimum, CNRA can maximize current funding sources to state agencies and conservancies by establishing policies which prioritize funding projects/programs which implement 30x30, Outdoors for All and Climate Smart

Lands initiatives. However, this strategy must be expanded into a more comprehensive funding strategy that goes beyond existing funding. The conservation (including acquisition, change in designation and/or restoration of lands and waters) and ongoing stewardship of an additional estimated six million acres of land in the next eight years will require significant new investment well beyond existing identified funding. The current funding identified in the draft report and in the proposed 2022-23 State Budget falls short of what is necessary to meet the 30x30 goal. With a projected budget surplus of nearly \$50 billion, it was very disappointing to see that the proposed budget included NO proposed augmentation to the funding agreed to in 2021. California must identify and dedicate a perpetual and annually appropriated source of funds specifically to implement its 30x30 Pathways Strategies to both restore or acquire and then manage lands and waters as well as to build and maintain capacity with the Tribes, state government, and non-profit organizations. Further, the state should ensure that 30x30 funding is providing maximum value by directing funding, where feasible, to benefit biodiversity and climate vulnerable communities, as discussed above. In addition, the state should create a dedicated funding stream to build capacity for Tribes, who are being asked repeatedly to respond to consultations without adequate staffing resources and need support for land restoration and stewardship. State funding should build upon and leverage existing federal conservation funding streams to the maximum extent possible. Finally, every year, the state should identify the funding it is using in the budget to achieve its 30x30 goals, assessing whether the state is on track to meet its 30x30 acreage goal at that funding level.

The Restoration and Stewardship Strategy Needs to Be Refined and Expanded. We were pleased to see that there is a specific strategy dedicated to restoration and stewardship of lands and waters. However, we suggest the following revisions. First, the strategy recommends creating a working group to identify degraded lands for restoration. The state should consider creating regional groups instead of a statewide group to make those recommendations to the state policy group. There should be metrics identified as to what is required to warrant restoration investment for 30x30 purposes and those metrics should be based on science. Second, restoration decisions should incorporate the criteria outlined in Appendix A of this letter. The 30x30 effort provides an important opportunity to focus restoration on degraded lands and waters such as urban creeks and streams and former quarries. With climate change shifting habitats, previously fragmented areas, including urban areas, may become even more important for restoration. Third, there should be a recommendation for examining opportunities to restore species to former ranges such as pronghorn reintroduction in the desert, beaver reintroduction to reestablish and maintain wetlands and waterways, and sea otter reintroduction for the benefit of nearshore ecosystems.

Connectivity Needs to be Included in Additional Strategies. We appreciate that the importance of connectivity is highlighted in the strategies associated with land acquisition and restoration. However, recommendations regarding conserving areas important for connectivity and restoring connectivity should also be included in the following additional strategies: Increasing Voluntary Conservation Easements, Enhancing Conservation of Existing Public Lands and Waters, Accelerating Regionally Led Conservation, Institutionalizing Advance Mitigation and in the recommended Science Strategy discussed above. In fact, the Pathways Report should include a recommendation to establish a statewide network of conservation areas that seamlessly connect landscapes managed by state, private, Tribal, and federal entities. This effort should include restoring degraded lands and waters that contain areas connecting habitat, acquiring inholdings to unify

fragmented landscapes, increasing research to identify important areas for the movement of species and species' genetics in the face of climate change, and reconnecting landscapes and waterways fragmented by infrastructure and development.

Strengthening Coordination Among Government and Key Partners Needs to Be Expanded to Include Recommendations for state agencies, local government, and non-governmental partners. We were pleased to see the emphasis on coordination and partnership in the Pathways Report. The recommendation to create a State-Federal interagency workgroup is consistent with the suggested governance structure discussed above. We also strongly support the focus on investment in Tribal conservation. However, this strategy fails to include any recommendations regarding coordination with other state agencies, local government, and non-governmental organizations such as local coalitions and NGOs working on equitable multi benefit nature based investments. There should be recommendations regarding how state agencies will incorporate the 30x30 goal into their work, building on and supporting existing partnerships, and working with local governments and community stakeholders to promote conservation planning and the embedding of those conservation plans into local land use decision-making.

Science Based Models, Traditional Ecological Knowledge, and Community Science

We appreciate CNRA's reliance on its sister agencies to produce science based datasets. However, especially given the continuing and serious data gaps in even basic biodiversity data, we encourage CNRA to also consider science based datasets that may be outside the scope of state agencies' familiarity and experience. Examples include Tribal knowledge that is not able to fit within the constrictive models from CNRA sister agencies. Furthermore, we strongly recommend that a "do no harm first" principle be applied when state science is lacking or inconclusive. If community science or Tribal knowledge points to a conclusion or theory supported by various data points but does not fit within state models, the state should not disregard these findings. Rather, the state should allow for informed, science based data modeling outside of its current modeling protocols or not make major decisions until it acquires the tools and experience needed to understand modeling and datasets outside their initial scope.

Conclusion

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 comments into consideration.

Sincerely,

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APPENDIX A

Suggested Criteria for a Scoring Matrix for Prioritizing Conservation:

Biodiversity

- Identified as a Key Biodiversity Area (Important Plant Area, Important Bird Area, Phylogenetic Endemism or other biodiversity hotspot, etc.)
- Is critical habitat for one or more rare species
- Supports one or more sensitive natural community
- Represents a vegetation type underrepresented in conserved areas
- Is habitat for one or more keystone species
- Serves as a wildlife corridor or linkage
- Holds surface or groundwater (riparian, oasis, marsh, vernal pool, etc.)
- Contains unique soils or other factors supporting endemism or high biodiversity
- Is identified as an area of high endemism or diversity, including phylogenetic measures
- Is within the past, current or projected range of a sensitive natural community or species, including lands or waters that could provide habitat benefits through restoration efforts
- Is a component of a state- or federally-adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Regional Conservation Investment Strategy.
- Lands with biodiversity value under threat of conversion to other uses

Climate

- Identified as a climate refugium or nucleus
- Can be or is managed as a buffer or greenspace against climate disaster such as sea level rise, flooding, wildfire, subsidence, extreme heat
- Offers migration or adaptation space for native species
- Represents a vegetation type or area particularly important for carbon sequestration (mature forest, wetlands, native perennial grasslands, caliche, kelp, and eelgrass)
- Provides elevational or other geographic connectivity that facilitates climate adaptation by species
- Limits expansion of the wildland-urban interface, thus reducing future wildfire ignitions and providing a natural fire buffer for fire-vulnerable communities.

Equity and Human Needs

- Provides access (ideally but not exclusively walkable and using public transportation) to natural areas within or near underserved/historically excluded communities
- Connects urban and wildlands to allow biodiversity connection
- Provides opportunities for teachers and children, as well as the broader public, to learn about biodiversity
- Provides family supporting green jobs in stewardship or community-controlled land management
- Contributes to sustainable food security, particularly lands that grow food for historically

underserved communities and/or on land owned by underserved/historically excluded communities or in community ownership

- Provides water-based ecosystem services (source water protection, filtration, flood buffering)
- Project was planned and developed in collaboration with underserved communities through meaningful community engagement and broad community support.
- Furnishes other ecosystem services, such as: native habitat for wildlife, water infiltration, heat mitigation, carbon sequestration, dust control, wastewater treatment, pollution control
- Creates more equitable distribution of open space
- Minimizes unintentional adverse impacts, such as:
 - Displacement and gentrification resulting from investment in park spaces
 - Increased obstacles to land acquisition for projects benefiting climate vulnerable communities
 - Increased cost burdens pertaining to accessing green spaces
 - Disruption of cultural sites
 - Adverse impact to biological communities

Support for Tribal Ownership, Management and Stewardship

- Furthers the goal of tribal land return.
- Project development respected and applied principles and practices of government-to-government consultation between California Native American Tribes and the State.
- The project supports opportunities for tribes to protect, restore, and manage their ancestral lands.
- The project supports opportunities to advance traditional use and enjoyment of ancestral lands by tribes by facilitating and prioritizing access to tribes.
- The project protects cultural resources and preserves sacred and culturally important sites.

APPENDIX B

Considerations for defining the term “climate vulnerable community”

ICARP Definition

As defined in by ICARP, “climate vulnerability” includes” the degree to which natural, built, and human systems are at risk of exposure to climate change impacts. Vulnerable communities experience heightened risk and increased sensitivity to climate change and have less capacity and fewer resources to cope with, adapt to, or recover from climate impacts. These disproportionate effects are caused by physical (built and environmental), social, political, and/ or economic factor(s), which are exacerbated by climate impacts. These factors include, but are not limited to, race, class, sexual orientation and identification, national origin, and income inequality.”

Data to consider for determining climate vulnerable communities:

CalEnviroScreen 4.0

While [CalEnviroScreen 4.0](#) does not include certain environmental, climate vulnerability, or biodiversity indicators, it does contain several data sets that support identification of socio-economic vulnerabilities. For example useful categories pertaining vulnerabilities in CES’s “pollution burden” framework include Ozone, PM 2.5, Diesel Particulate Matter, Drinking Water Contamination, Pesticide Use, Cleanup Sites, Groundwater Threats, Impaired Waters, Hazardous Waste, and Solid Waste Sites. Vulnerabilities pertaining to “population characteristics” include Asthma, Cardiovascular Disease, Low-birth Weight, Education, Low Birth Weight, Housing Burden, Linguistic Isolation, Poverty, and Unemployment. These factors accentuate vulnerability to climate and other environmental stressors.

California Department of Public Health Climate Change and Health Vulnerability Indicators

To the extent possible, we urge CNRA to coordinate with the California Department of Public Health to incorporate climate projections and vulnerability indicators utilized in their [Climate Change and Health Equity Framework](#) and CalBRACE initiative. These efforts were established to support California’s ability to “plan for and reduce health risks associated with climate change.” These indicators included in these planning resources include:

- *Environmental Exposures:*
 - Extreme heat days: Projected number of extreme heat days
 - Air quality (PM 2.5/ Ozone)
 - Drought: palmer drought severity index
 - Wildfires: Percentage of population currently living in high fire risk hazard zones
 - Sea level rise: Percentage of population living in 100-year flood zone and 55 inches of sea level rise
- *Population Sensitivity:*
 - Children: percent of population aged less than five years
 - Elderly: Percent of population aged 65 years or older
 - Poverty: Percent of population whose income in the past year was below poverty level
 - Education: percent of population aged ≥ 25 years with less than a four year college

- educational attainment
- Race and Ethnicity: Percentage of population of color
- Outdoor Workers: Percentages of population employed and aged ≥ 16 years working outdoors
- Vehicle Ownership: Percentage of occupied household with no vehicle ownership
- Linguistic isolation: Percentage of households with no one aged ≥ 14 years speaking English
- Physical and mental disability: Percentage of population living with mental and/or physical disability
- Health insurance: Percentage of population without health insurance
- *Adaptive Capacity:*
 - Air conditioning: Percentages of household without air conditioning
 - Tree canopy: Percent of area not covered by tree canopy
 - Impervious surfaces: Percent of area covered by impervious surfaces
 - Public transit access: Percent of population not residing within 0.5 mile of bus/ferry/ferry stop with < 15 minutes waiting time during peak commute hours

SB 379 Local Government Climate Vulnerability Assessments

[SB 379](#) requires all cities and counties in California to incorporate climate adaptation and resiliency into the general plan safety element, or by reference to other documents. Specifically, local governments must (1) review and update the safety element as necessary to address climate adaptation and resiliency strategies; (2) complete a vulnerability assessment; (3) develop adaptation and resilience goals, policies, and objectives; and (4) develop feasible implementation measures. However, because the state has not enforced the SB 379 requirement these assessments are inconsistent. The state should incorporate these assessments where completed and consider increasing enforcement of SB 379, set a threshold for approval of a climate vulnerability assessment through a guidance paper from the CA Governor's Office of Planning and Research (OPR) and CNRA, and ways to increase funding for completing assessments.

Tribal Lands and Allotments:

Tribal lands are defined as federally recognized Native American reservations and allotments per the [California Native American Heritage Commission](#). The [Preliminary SB 535 Disadvantaged Communities Designation](#) by the CalEPA and [CPCU/CEC Disadvantaged Community Groups Framework](#) proposes identifying all areas within federally recognized tribal boundaries in California as disadvantaged communities.

Low Income Tracts and Allotments

Low income communities and households are defined as the census tracts and households, respectively, that are either at or below 80% of the statewide median income, or at or below the threshold designated as low income by the California Department of Housing and Community Development 2016 [state income limits](#).

Suggestions from Coalition

Other factors for determining community vulnerability, as discussed by our coalition, should include but are not limited to:

- Quality of housing stock
- Percentage of communities without healthcare
- History of natural disaster occurrence
- Income
- Access to natural open space
- Increased heat stress
- Drought vulnerability
- Degraded air quality, water quality, & soil health
- Lack of access to emergency services
- Lack of green and other critical community infrastructure
- Proximity to polluting and harmful land uses
- Rates of hospitalizations
- Risk of displacement from climate-related natural disasters
- Energy cost burden resulting from climate impacts
- Increase of pests due to changing warming patterns.
- Areas identified in County Environmental Justice Elements
- County Climate Action Plans
- Census Hard to Reach Data

We also support allowing potential applicants to submit supplemental information pertaining to community vulnerability metrics that may not be explicitly mentioned in program guidelines.

APPENDIX C

California Desert Maps Show Larger Footprint than CNRA's 30x30 Inland Desert Regional Map

California Desert Maps Showing A Larger Footprint Than CNRA's 30x30 Inland Desert Regional Map

