



 **Audubon**
CALIFORNIA

September 3, 2021

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

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

Dear Deputy Secretary Norris:

On behalf of the undersigned organizations, we are writing to provide our initial recommendations regarding the development of the state's 30 by 30 Strategy as it relates to the Sierra Nevada region. We submit this letter as the Caldor Fire burns into the community of South Lake Tahoe and the Dixie Fire rages across Plumas, Lassen, Butte, Tehama and Shasta Counties - the latter California's second largest and 14th most destructive wildfire in history. Every National Forest unit in California is temporarily closed to the public due to lack of resources to adequately manage and protect the landscapes. A united vision for conservation is more urgent than it has ever been. The communities of our region are living with the climate crisis in real time, as drought, floods, wildfire, and seasonal changes become the new normal.

As defined by the California Natural Resources Agency (CNRA), the "Sierra Nevada Region" consists of the Sierra Nevada proper, southern Cascades, Modoc Plateau, western Great Basin, and a large part of the northern Mojave Desert. The region includes both Mount Whitney--the highest point in the lower forty-eight states, and Badwater Basin in Death Valley National Park--the lowest point in North America. We urge CNRA to recognize the great ecological and geographical diversity of this region and that there are likely a multitude of conservation solutions necessary to address its climate, biodiversity and access needs.

I. Key Takeaways for the 30 by 30 Process

The 30 by 30 effort establishes a critical opportunity to help address the climate, access and biodiversity needs of the Sierra Nevada region. In this document, we identify eight high level, region-specific opportunities and 43 corresponding direct actions that we recommend to be adopted as part of a comprehensive 30 by 30 process. Priorities outlined in this document range from issues of Tribal sovereignty and land management as well as the need to partner with federal land managers to issues of climate change, access, the voluntary conservation of private lands, and public engagement.

The document additionally identifies the many concerns felt daily by stakeholders of the Sierra Nevada region, which include the existential and daily threats of climate change, drought and fire, adequate representation of Tribal groups and environmental justice communities, funding limitations, expansive development, and habitat degradation and fragmentation. Although all of our groups are committed to 30 by 30 as expansively described in E.O. N-82-20, the state's specific commitment to "conserve at least 30 percent of California's land and coastal waters by 2030" may be in doubt without a corresponding

commitment to fund and implement the process at the scale and speed necessary. As you review this letter, we invite you to consider how the issues we identify can be implemented. Key to this process will be working in partnership with Tribes, federal land managers, local government and land trusts and NGOs, such as ourselves, who are working on-the-ground in the Sierra Nevada region on the strategies outlined below. Likewise important is developing a scientific mechanism that supports and tracks region-specific actions.

II. Introduction to the Sierra Nevada Region

Sierra Nevada forests and watersheds, comprising one-quarter of the state's land mass, provide over 60 percent of California's water supply, serving 25 million Californians. The region is the backbone of the state's expanding \$92 billion outdoor recreation economy that serves 50 million visitors annually.

The Sierra's unique landscape includes topographically complex terrain that creates varied microclimates, deep snow drifts that allow for stable rates of runoff and recharge, valleys that harbor cold air pools and temperature inversions, cold groundwater inputs, and forests and forest canopy, all of which are integral components to California's climate resilience. However, climate change has provided existential threats to the region such as catastrophic wildfires, drought, extreme heat, and flooding, which each threaten the Sierra's ability to sequester carbon in its forests, protect the state's water supply and provide wildlife habitat. Intensive resource management and housing development are additional threats to the region, as each has degraded and fragmented the region's landscapes, making the region more prone to wildfire and other negative effects of climate change.

The Sierra Nevada is a critical landscape for California to meet its 30 by 30 goals for biodiversity conservation, climate resilience and improved equity for communities. The Sierra Nevada contains a mix of public and private lands of critical importance. Public lands make up the majority of the Sierra Nevada Region, which includes over 19.2 million acres of some of California's most spectacular federally-managed public lands and waters. Federal land managers include the National Park Service, Bureau of Land Management, and US Fish and Wildlife Service and US Forest Service; state agencies such as the State Lands Commission, California Department of Fish and Wildlife and California State Parks are also land managers. While most of the higher elevations and the eastern Sierra are public lands, most of the oak woodlands and lower mixed conifer forests and rangelands below 3,000 feet on the western slope are in private ownership. There is a checkerboard ownership pattern of private and public lands in areas of the northern half of the Sierra Nevada that lie near historical railway routes. These private lands are an essential part of both the ecological health and economic vitality of the Sierra Nevada Region.

The Sierra Nevada region is the ancestral home of many Tribal nations, including the Maidu, Pit River, Miwok, Mono, Washoe, Yana, Shoshone, Paiute, Modoc, and Yokut peoples, among others. These native peoples are the original stewards of the land and have a wealth of Traditional Ecological Knowledge (TEK), including a deep understanding of how to live in harmony with the earth and ways in which to sustainably tend to key plants and habitats. The preservation and protection of cultural resources, including water, must be a top priority for the 30 by 30 process. The 30 by 30 process provides an

opportunity to support the return of traditional lands to Tribes, as well as facilitating opportunities for management, co-management and renaming.

The health of the recreation economy is key to the communities of the Sierra Nevada Region and beyond. These recreation opportunities need to be accessible to all Californians--residents and visitors alike. Millions of tourists visit the Sierra Nevada Region every year to enjoy its boundless recreation opportunities and scenic splendor. From the Pacific Crest National Scenic Trail to its hundreds of campgrounds, the Sierra Nevada Region offers world-class hiking, cycling, angling, hunting, camping, picnicking, swimming, whitewater boating, flatwater boating, birding, climbing, scenic touring, and a multitude of other outdoor activities.

Hundreds of thousands of people call the Sierra Nevada Region home today. Some of the key communities include Kernville, Lone Pine, Auburn Rancheria, Bishop, Sonora, Mammoth Lakes, Mariposa, Nevada City, Pit River, Grass Valley, Truckee, Lake Tahoe, Quincy, Alturas, and Susanville, among others. While some of these communities are thriving, others are facing multiple challenges, many of which stem from systemic inequality and extractive industry. The region faces some of the greatest income inequality and poverty in California. The recreation economy, as well as remote working with COVID-19, has brought benefits, but also increased housing shortages in areas like Lake Tahoe where rising prices have pushed out those who support these economies. It is our strong conviction that, if properly planned, implemented, and funded with equity and conservation at its core, the 30 by 30 process will greatly benefit Tribes, visitors, residents, and communities throughout the Sierra Nevada Region and beyond while ensuring that the plant and animal species that call this region home are protected and thriving.

Protected public lands and conserved private lands managed for conservation provide multiple values and benefits, including:

- **Critically important plant and wildlife habitat.** The Sierra Nevada alone (this time excluding the Modoc, Great Basin, and Mojave) includes over 3,500 native plant species and is inhabited by about 572 animal species.
- **Clean water.** The Sierra Nevada Region, and especially its public lands, serve as the source of many of California's most important streams, including the Feather, Yuba, American, Cosumnes, Mokelumne, Stanislaus, Tuolumne, Merced, San Joaquin, Kings, Kaweah, Tule, Kern, Truckee, Pit, Carson, Walker, and Owens Rivers.
- **Clean air.** Class I Airsheds as defined by the Clean Air Act are National Parks and Wilderness Areas protected before 1977. In the Sierra Nevada Region, there are four National Parks and ten Wilderness Areas in this category. Under the Clean Air Act's regional haze provisions, these Class I areas are required to reach natural levels of visibility by no later than 2064.
- **Carbon sequestration.** The forests and meadows of the Sierra Nevada Region store significant amounts of carbon, helping reduce the threat of climate change. Properly managing and restoring these lands not only sequesters carbon but improves water storage capacity and quality as well.
- **Opportunities to support Tribal management, co-management, stewardship and Tribal acquisition.** Tribes have managed ecosystems in this region for thousands of years. This active

management has been an important part of creating this region's rich biodiversity. On September 25, 2020, the Governor released a [Statement of Administration Policy on Native American Ancestral Lands](#) to encourage State entities to seek opportunities to support California tribes' co-management of and access to natural lands that are within a California tribe's ancestral land and under the ownership or control of the State of California, and to work cooperatively with California tribes that are interested in acquiring natural lands in excess of State needs. 30 by 30 provides an opportunity to implement this policy.

- **Recreation.** Recreation provides opportunities for solitude, spiritual rejuvenation, improved health, and other personal benefits.
- **Economic Benefits.** Outdoor recreation generates billions of dollars in revenue annually and is one of the most important contributors to the economic wellbeing of the Sierra Nevada Region's communities. Increased conservation will provide increased outdoor recreation opportunities and create jobs and revenue for local communities.
- **Keep the State's agricultural lands productive through permanent conservation that supports biodiversity.** Conservation in this region protects water, soil, and pollinator resources that are important for biodiversity as well as farmers and ranchers and California's \$53 billion agricultural economy and the rural communities that rely on agriculture.

III. Challenges to the People and Environment of the Sierra Nevada Region

Public lands offer important economic and environmental benefits to the Sierra Nevada Region as well as to the state. Despite their irreplaceable values, many public lands in the Sierra Nevada Region are open to multiple threats, which include impacts related to climate such as disruption of natural fire ecology, watershed degradation and loss of biodiversity; impacts from development such as habitat fragmentation, industrial usage of the land, road building, and user-created trails; and impacts from the extraction of local resources, which include mining, illegal dumping, trespass cannabis cultivation, erosion from grazing, unsustainable logging practices, and the introduction of non-native species such as non-native trout. An overarching catalyst for these impacts to the Sierra Nevada Region is the issue of under-funding and the lack of *sustained* funds, which prohibits the conservation and adequate land management of these important public spaces.

Private natural and working lands are even more threatened. Poorly-planned housing development expansion, subdivisions (creation of new parcels), fragmentation (individual sale of legal parcels), water diversions, unsustainable logging practices, mining, road construction, energy development, poor grazing practices, and the clearing of oak woodlands and other key habitats, are examples of activities that have already degraded and destroyed the ecological integrity of the landscape. Without prompt action we will lose what is left of these lands.

The issues of climate change, habitat degradation and fragmentation, and regional conservation funding critically impact the people of the Sierra Nevada Region. The health of our region is dependent on access to clean water and air, and our local economy is reliant on the recreational opportunities the land has to offer. As we make strides statewide in climate mitigation and adaptation, as well as sustainable development, it is clear that the way decision making bodies, such as federal and state agencies and local

planning departments, take action must be transformed to be inclusive of and led by the Indigenous knowledge, traditional knowledge, and cultural knowledge that exists within the Sierra Nevada Region.

IV. 30 by 30 Opportunities to Support Socially, Economically and Environmentally Just Outcomes in the Sierra Nevada Region

The challenges identified above saturate the realities and lived experiences of the people and environment that make up the Sierra Nevada Region daily. The opportunities and recommendations outlined below are designed to address these constraints and to develop a future of the Sierra Nevada Region that is just by social, economic and environmental measures. As such, the approaches include improving government to government consultation with Tribes; supporting equity and environmental justice; responding to climate change; addressing land management and protection needs for both public and private lands; improving access; and engaging local decision makers and stakeholders on the importance of 30 by 30 and its impact on the local and regional environment and economy.

As an overarching comment, in addition to the specific recommendations below, we urge CNRA to review and consider the [California Wildlife Action Plan](#) for this region which includes a comprehensive conservation strategy for the region.

A. Meaningful government to government consultation with Tribes and support of Tribally-led management efforts.

When it comes to the 30 by 30 Strategy, we specifically urge the State of California to:

1. Consult with all affected Tribes in the region through the government-to-government consultation process and meaningfully incorporate the results of the consultation into the 30 by 30 process in a way that respects confidentiality.
2. Work with Tribes and Indigenous-led organizations to identify lands in the Sierra Nevada Region for management, co-management, land return and ecological stewardship.
3. Work with Tribes and Indigenous-led organizations to identify locations in the Sierra Nevada Region for renaming.
4. Support increased capacity of Tribes to participate in government-to-government consultation and planning processes without impeding Tribal sovereignty.
5. Change California's fire-suppression regulations to increase the ability of Indigenous communities to conduct cultural burns.

B. Support Equity and Environmental Justice:

1. Environmental justice as defined by the state of California means the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national

origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

2. Because of their historic under-representation in natural resource planning decisions, it is important to make additional efforts to inform Tribes, environmental justice groups and underrepresented communities about projects and proposals. CNRA should remain transparent and dedicate meaningful resources to reach out early and often to these communities, in languages that are both understandable and accessible to communities that might face limited English proficiency, lack access to formal education, and experience other obstacles to engagement. They should also augment outreach with non-traditional communication methods.
 3. Under the leadership and guidance of Black, Indigenous and People of Color (BIPOC) leaders, CNRA should develop and implement a strong definition of “equity,” shared metrics and definitions, as well as measurable outcomes to guide this process. In addition to conservation investments which benefit communities which have been historically-excluded or underserved, 30 by 30 outcomes should meaningfully address systemic inequity by providing representation, meaningful participation, and quality experiences/outcomes for historically-excluded and underserved communities.
 4. Incentivize restoration and conservation management actions, green economy jobs, and job training for environmentally-focused positions at the local and statewide level to support high quality opportunities for economic advancement.
 5. Improve representation of communities of color by designating local land-based cultural resources as cultural heritage sites, to conserve and preserve cultural histories for future generations.
- C. Identify and implement approaches that address local challenges to the Sierra Nevada Region as presented by climate change.

To achieve an equitable 30 by 30 strategy that protects and restores biodiversity and ensures a climate resilient future for the Sierra Nevada Region, we propose the following recommendations:

1. Ensure climate smart strategies that advance environmental justice do no harm by incorporating equity and public health analyses and ensuring program implementation beneficiaries include small farmers and disadvantaged communities. When possible, prioritize multi-benefit programs and projects as well as efforts to support disadvantaged communities and small farmers.
2. Identify key public and private lands and waters that deserve protection or special management because of their superlative natural, cultural, or other values, or because they are needed to increase climate resiliency. In the Sierra Nevada Region, **it is**

particularly important to protect lands that include ecosystem types that are under-represented in the current network of protected lands. Most of the lands in the Sierra Nevada protected through the National Park and National Wilderness Preservation Systems are composed of mixed conifer forest, sub-alpine and alpine habitats, while there is relatively little protection for blue oak woodland, foothill woodland, chaparral, sagebrush steppe, riparian areas, wetlands, wet meadows, and other low-elevation habitat.

3. Work with and support through increased capacity (technical and financial) California's land trusts, regional partnerships, and other community-based organizations. These local and regional organizations and partnerships will be critical to the protection and management of private lands, and must be integral in the 30 by 30 Strategy. For example, land trusts work across public and private interests to conserve natural areas, parks, and farmlands, to the benefit of local economies, educational opportunities, and the public health of all Californians. In a recent survey of land trusts, several land trusts within the Sierra Nevada region stated that with additional resources, they could protect and manage an additional several hundred thousand acres for the benefit of biodiversity, climate resilience, and improved access to nature. In line with the Governor's Executive Order N-82-20, land trusts should continue to implement land conservation by working with willing landowners to permanently conserve privately owned land with conservation easements, acquire lands for public benefit from willing landowners, and use adaptive management projects that provide direct benefits by improving the resiliency of our communities and conserved lands to advance California's climate goals.
4. Implement the conservation priorities identified within the [Southern Sierra Partnership Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains](#) (the "Framework"). This nationally recognized, science-based climate adaptation strategy includes a detailed assessment of conservation priorities across a seven-million acre region stretching from the peaks of the Sierra Nevada and Tehachapi Mountains to the San Joaquin Valley floor. Based on a detailed assessment of how climate change is likely to affect key species, as well as ecosystem services such as carbon sequestration, forage production and aquifer recharge, the Framework proposes a network of priority conservation areas, connected with existing protected lands and with each other. We urge the Natural Resources Agency to incorporate this Regional Conservation Design, which is described in the Framework and [available in shapefile form](#), into 30 by 30 planning and investments for our region.
5. Support the implementation of the priorities identified in the [Strategic Conservation Action Plan for the Sierra Cascade Land Trust Council](#) (SCLTC). SCLTC is made up of 14 local land trusts and six larger conservation organizations. Together, these 20 organizations have over 640 years of conservation experience. Collaborating with private landowners on voluntary, incentive-based conservation is central to the conservation efforts of SCLTC. Protecting land and water in the Sierra Cascade region has enormous

conservation benefits, making the region a priority for investment in strategic, large-scale land conservation. Studies estimate that for every \$1 invested in conservation, \$4 to \$11 is returned in natural goods and services like clean air and water and reduced risk of flooding. A recent analysis from the California Rangeland Trust showed a return of up to \$168 per dollar invested for permanent conservation of threatened resources. The benefits of conservation in the Sierra Cascade region include: providing clean water and preventing flooding, rural economic support and protecting working lands, supporting the recreation economy and promoting public health, protecting diverse and unique plants and animals, restoring Indigenous connections to and stewardship of the land, and promoting climate resilience.

6. Support the implementation of the priorities identified by the [Northern Sierra Partnership](#). This partnership is working on conserving and restoring important landscapes within the Northern Sierra. As a final step in their projects, the Partnership creates facilities that will allow the public to access and enjoy these protected lands, including trailheads, trails, welcome kiosks, restrooms, overlooks and interpretive signage. Their projects include work to protect Martis Valley, Sierra Valley, Frog Lake, and the forests around Independence Lake.
7. Work with federal and state agencies, Tribal groups, NGOs, land trusts and private landowners to protect, improve, or restore connections between large blocks of habitat and to reduce or eliminate barriers to movement for wildlife, both now and under future conditions when natural communities may shift due to climate change impacts. There have been many efforts to identify important wildlife connectivity areas. The State should prioritize the following investments that reduce habitat fragmentation caused by roads:
 - US 395 Corridor in the Long Valley Wildlife Crossing project area located between CA 203 and the Crowley Lake area
 - US 395 Corridor between north of Reno, NV and Susanville, CA
 - Hallelujah Junction (CA 70 and US 395) then south through the town of Sierraville to the McKinney Bay area of Lake Tahoe
 - I-80 Truckee River Canyon
 - I-80 Donner Summit
 - CA 4 Alpine County
 - CA 89 Junction with CA 88
 - CA 36E Mill Creek to Chester
 - CA 108 Strawberry to Donnell Vista
 - CA 180 Kings Canyon Foothills to Dunlap
 - CA 178 Canebreak Flat
 - CA 58 Tehachapi Grade
 - CA 223 to the town of Tehachapi

In addition, the State should strategically conserve lands that connect landscape blocks of core habitat to enhance wildlife movement, migrations, and climate adaptation, [especially lower lying elevations in the Sierra foothills](#).

8. Utilize the [California Essential Habitat Connectivity Project \(CAEHCP\)](#) to strategize conservation efforts to reduce habitat fragmentation and allow wildlife to maintain robust populations through reproduction and survival and provide opportunities for species to adapt to climate change. According to the CAEHCP, large portions of the Sierra Nevada ecoregion, principally in higher elevations, are moderately well protected, contain high ecological integrity, and run contiguously from North to South but are fragmented by roads. Roads crossing the Sierra generally experience high rates of wildlife-vehicle collisions and would especially benefit from wildlife crossings facilitating safe passage across roads to access adjacent habitats. In contrast to protected, high-elevation regions, areas that are essential to connecting high elevation parks and wilderness areas to lower elevation habitats, especially on the Western side of the range, are highly fragmented with little protection. Thus, strategically connecting habitats through enhanced protections and road ecology measures would promote biodiversity abundance by allowing wildlife to access their necessary range and adapt to climate change.
9. Utilize the California Department of Fish and Wildlife's [map of wildlife connectivity areas in the Northern Sierra Nevada foothills](#), the [Southern Sierra Nevada Pacific Fisher Conservation Assessment](#) and the information from the [Northeastern California Wildlife Connectivity Symposium](#) to identify other key connectivity areas.
10. Listen to land managers about how to facilitate and support science-based existing and new regenerative and adaptive stewardship and management actions that support climate resiliency and adaptation, protect and restore native biodiversity, and keep agricultural lands productive. Pesticides, both legal and illegal, harm the region's air and water quality, hurt workers and contribute to the decline of the region's biodiversity, including the threatened red-legged frog and Pacific Fisher.
11. Actively support efforts to protect and restore the important watersheds, wetlands, rivers and streams within the Sierra Nevada. The Sierra Nevada provides drinking water for 60% of California, yet many rivers and streams are degraded from road-building, logging, mining, diversions, and other development activities. There are many partnership efforts to protect and restore the Sierra watershed including mountain meadow restoration and improved forest management. California must prioritize not just protecting lands, but ensuring that these lands are protected, restored and managed to sustain healthy watersheds.
12. Incorporate 30 by 30 goals into strategic wildfire planning efforts throughout the Sierra. 30 by 30 land protections should help re-establish mixed severity fire as an ecological process and should help Sierra communities become prepared and resilient to wildfire.

In particular, 30 by 30 goals should be expanded to help reduce current barriers to cultural burning and prescribed fire, both of which have been found to reduce intensity of future wildfires as well as improve Indigenous stewardship across the landscape. The following efforts are integral to implementing Indigenous knowledge of fire management and adopting its corresponding approaches:

- Reduce barriers to permitting by expanding air quality limits to allow for the use of good fire, improving internal efficiency at local air districts, and reducing permitting costs for intentional burns
- Reduce liability concerns by expanding insurance adequacy and availability
- Provide public education on the benefits of good fire and improve agency culture by educating state agencies on tribal sovereignty

13. Adopt regulations through the California's State Mining and Geology Board to ban open-pit mining.

D. Address the land protection and management needs for public lands in the Sierra Nevada region.

In order for the 30 by 30 strategy to be successful, the State must invest in both public and private lands, and particularly in "durable" landscapes that have the benefit of permanent protection (via conservation easement, deed restriction, or public lands designated and managed for conservation).

To achieve an equitable 30 by 30 process that considers the needs of public lands in the Sierra Nevada Region, we offer CNRA the following recommendations:

1. Engage in meaningful government-to-government consultation with Tribes to support and facilitate efforts around management, co-management, stewardship renaming, and returning Tribal lands and sacred sites. Re-acquired ancestral lands across the state should be managed by tribal people. An example of these ancestral lands is Maidu National Park, a vast and unique park system dedicated to the purposes of education, healing, protection, and ecosystem management based upon the Maidu cultural and philosophic perspectives, as expressed through traditional ecology.

The Mountain Maidu have been working since 2003 to reacquire lands from Pacific Gas & Electric (PG&E). September 20, 2019, is a historic date in Maidu Summit Consortium (MSC) history, as this was when 2,325 acres of Tásmam Koyóm (Humbug Valley) was returned to the Mountain Maidu people. Similar initiatives will create opportunities for Tribal management and co-management and break down barriers for stewardship based on traditional ecological knowledge.

2. Urge Congress and the State Legislature to work with Tribes and communities to craft and pursue new legislative protections for California's public lands and waters which

have community support. A few key lands and waters in the Sierra Nevada Region that people have been struggling to protect for decades include:

- Pit River Canyon Wilderness Study Area in the BLM's Applegate Field Office
 - Medicine Lake Highlands in the Modoc NF
 - The Mill, Deer, and Antelope creek watersheds in the Lassen NF
 - The watershed of the Middle Fork Feather Wild and Scenic River in the Plumas NF
 - The "checkerboard" region in the American River watershed in the Tahoe NF
 - The popular backcountry recreation areas on the western shore of Lake Tahoe in the Lake Tahoe Basin Management Unit of the US Forest Service
 - Caples Creek Proposed Wilderness in the Eldorado NF
 - The Sonora Pass region in the Stanislaus NF
 - Pacific Valley and Eagle Near Natural Areas on the Stanislaus NF
 - Devil's Gulch Proposed Wilderness and other wild lands and waters in the Sierra NF
 - Popular recreation sites and wild lands along the Kern River in the Sequoia NF
 - USFS-recommended wilderness areas in the Excelsior Mountains and elsewhere in the Inyo NF
 - Conglomerate Mesa and the Haiwee area near Owens Lake in the BLM's Ridgecrest Field Office
 - Bodie Hills in the BLM's Bishop Field Office
 - Eagle Lake and the Skedaddle Mountains in the BLM's Eagle Lake Field Office
 - Merced River Gorge in the BLM's Mother Lode Field Office
 - Sweetwater Mountains in the Humboldt-Toiyabe NF
 - Amargosa Region
 - Panamint Valley, BLM, Ridgecrest Office
 - Martis Valley, Truckee River and Little Truckee River Watersheds
3. Use the state's legal power and permitting authority to stop or challenge proposed destructive energy, logging, road construction, oil and gas, or other projects on public lands or mineral estate that would destroy habitat, increase carbon emissions, or harm communities in the Sierra Nevada Region. Areas threatened by these forms of resource extraction include:
- Medicine Lake Highlands in the Modoc National Forest, a region of great cultural significance to local Tribes that is seriously threatened by energy development.
 - The scenic, historic, and ecologically critical Bodie Hills in Mono County managed by the BLM Bishop Field Office that is threatened by mining.
 - Joshua tree-studded Conglomerate Mesa in Inyo County managed by the BLM Ridgecrest Field Office is gravely threatened by proposed gold mining.
 - The Haiwee area south of Owens Lake in Inyo County managed by the BLM Ridgecrest Field Office is important to Tribes and others and is of immense ecological value. It is threatened by two proposed energy projects.
 - BLM parcels in or near the San Joaquin Valley threatened by oil and gas development, including hydraulic fracturing or "fracking."

4. Improve conservation management of State Lands Commission parcels, especially where they exist as inholdings among protected public lands. Ensure that the lands are conserved and connected to other protected parcels to the maximum extent possible.
5. Form productive partnerships with the federal government, through Memorandums of Understanding or other mechanisms, and actively engage in federal land management planning processes --particularly those undertaken by the USFS, BLM, and USFWS. When participating in these processes, strongly encourage the federal agencies to pursue 30 by 30 conservation and equity goals. Assist federal land managers by helping the agencies identify areas that are important for conservation and/or access. Identifying areas with outstanding outdoor recreation values during land use planning enables advocates and others to further leverage the importance of recreation as a means for advancing conservation values, as well as managing recreational impacts and supporting recreational experiences, equitable access, and the outdoor recreation economy.
6. In the Sierra Nevada Region, it is especially important that the state actively participate in the development of revised Land Management Plans for the Sequoia National Forest and Sierra National Forest. The USFS expects the next iteration of the two plans to be released no later than January 2022. We ask that the CNRA join with advocates in the effort to ensure that these plans advance 30 by 30 conservation and equity goals and to file objections as necessary to achieve appropriate resolutions.

E. Address the land protection and management needs for private lands in the Sierra Nevada region.

In addition to what was discussed above in Section B, to achieve an equitable 30 by 30 process that considers the needs of *private* lands in the Sierra Nevada Region, we ask you to:

1. Work with private landowners, land trusts, and resource conservation districts to better protect biodiversity and promote conservation-friendly fire-resilience on private “working lands,” especially privately owned timber lands in the western Sierra Nevada and southern Cascades.
2. Work with agencies, private landowners and land trusts to identify strategically important private lands that can be voluntarily acquired from willing landowners and voluntarily protected or placed under a permanent conservation easement. Consider the protection and restoration of important habitat, migration corridors and habitat connectivity, public access, equity, and other key factors when identifying priority lands. In the Sierra Nevada, it is especially important that the State help the Tahoe National Forest, land trusts, and other partners voluntarily acquire the remaining private lands in the “checkerboard” region near Donner Pass.

3. Provide greater and more predictable annual funding for voluntary private land conservation and management through agencies that have proven to provide good results, such as the CNRA, Wildlife Conservation Board, Sierra Nevada Conservancy, and Department of Conservation.
4. Invest in capacity building for partnerships, lands trusts, and community based organizations so that they are more able to contribute to California's 30 by 30 goal. Many organizations lack sufficient funding to carry out the planning and execution of acquisitions and easements, conducting community outreach, and managing and monitoring protected lands. There are current successful models from other contexts that could be replicated, including [CALFIRE's Urban and Community Forestry Grant](#) Program that invests in projects, planning, management and workforce development and the Department of Conservation's [Resources Conservation District \(RCD\) Financial Assistance Grants](#) that invests in RCD capacity building.
5. Ensure that in addition to increasing funding for the acquisition of land from voluntary sellers that there is equal effort put into making available sufficient funding for the long-term management of these protected lands so that these lands continue to provide conservation and, where applicable, access benefits. Funding for management should also include providing funding for monitoring and science.

F. Improve equitable access to public lands.

Although the Sierra region has many amazing public lands and open spaces, there is work to be done to make them accessible and welcoming to visitors and residents. We suggest the following actions to improve access to open space in our region:

1. Work with state agencies, federal land managers, and Congress and the State Legislature to ensure that fees for camping and other activities on public lands do not become prohibitive for lower-income visitors.
2. There is often very little public transportation available to the region's public lands, in part due to funding and planning decisions that prioritize certain communities over others. This process should prioritize funding for transit to trailhead communities to connect communities, such as farmworker communities on the San Joaquin Valley floor, to their public forests.
3. Programming efforts of local land trusts and other NGO's throughout the Sierra that work to connect youth to nature through outdoor experiences and education such as wildflower walks, bird-watching tours, volunteer restoration days, art classes and nature exploration, and many more. Even in this rural region, there are many who never get the chance to explore the wild world beyond their backyards, and this needs to

change. The 30 by 30 process should ensure that youth throughout the region feel welcome in nature and that programming is culturally appropriate.

4. Interpretive signage and trails in multiple languages, including signage that educates and informs on the region's Tribes; as well as better monitoring, should be put in place to make all of the region's residents feel comfortable and safe in nature.
5. Direct conservation investments towards areas which are historically underserved and direct local hiring and other provisions which benefit local communities.

G. Support Federal, Tribal, and local level government agencies working to implement 30 by 30 policy.

Resources and funds should be provided to California's Tribes and government agencies to ensure adequate implementation of 30 by 30 policy. The CNRA should identify approaches to support Tribes and local governments that include the following:

1. Fund grant programs for Tribal governments to hire the staff needed to meaningfully participate in the 30 by 30 process without impeding tribal sovereignty.
2. Urge Congress to appropriate sustained funding levels for the BLM, USFS, USFWS, and NPS that will enable the agencies to effectively manage and protect California's federal public lands and waters and provide for equitable, well-planned, and sustainable access and recreation.
3. Provide for adequate and sustainable funding for California state parks, wildlife refuges, and other conserved lands.
4. Provide sufficient resources for the California Department of Fish and Wildlife (CDFW) to fulfill its mission, including staffing for environmental review and permitting, and species and habitat conservation to address the significant staffing shortfalls identified in CDFW's Service Based Budget Final Report (January 20, 2021).
5. Fund local governments to implement 30 by 30 at the local level through general plans, elements, zoning, and other tools.

H. Engage local decision makers and stakeholders on the importance of 30 by 30 and its impact on the local and regional environment and economy.

To ensure decision-maker engagement and buy-in, we urge you to:

1. Share information with county supervisors and other local elected officials about the importance of 30 by 30 and encourage them to support related conservation and equity access enhancement efforts in the Sierra Nevada Region.

2. Educate the community about the value of conservation easements and demystify what they are.
3. Teach California's school children about biodiversity, conservation, public lands and waters, and other key topics. Support experiential education programs to help kids experience and learn about public lands, conservation, and nature in-person.

IV. Community Priorities in the Sierra Nevada Region

We will close by offering our collective responses to the questions developed for the 30 by 30 CNRA regional workshops.

Question 1: What are the habitats and species most important to you?

We strongly support efforts to ensure the future viability of all species of plants and wildlife that are native to the Sierra Nevada Region as defined by the CNRA. A few of the many key wildlife species of concern in the region include the bald eagle, goshawk, California condor, pileated woodpecker, willow flycatcher, pine marten, Pacific fisher, gray wolf (notably including the Lassen and Beckwourth packs), Sierra Nevada red fox, bighorn sheep, wolverine, mule deer, elk, pronghorn, Bi-State sage grouse, desert tortoise (in the Mojave), California spotted owl, Cascades frog, Yosemite toad, yellow-legged frog, Inyo Mountains slender salamander, California tiger salamander, California dogface butterfly, and many unique fish species such as the Lahontan cutthroat trout, golden trout, Eagle Lake trout, and the salmon and steelhead that ply the waters of Deer, Mill, and Antelope Creeks.

Of special note are the two known wolf packs in the Northern Sierra - the Lassen and Beckwourth Packs. The Lassen Pack occupies a large 500 square mile home range in western Lassen and northern Plumas counties. The alpha male originated from the Rogue Pack in southwest Oregon and the alpha female from somewhere in the Northern Rockies. They have produced litters in 2017 (4 pups), 2018 (5 pups), 2019 (4 pups), and 2020 (at least 9 pups) with 2021 reproductive status yet to be seen. The Beckwourth Pack was confirmed in late August to have survived the Dixie Fire. The return of this keystone species, along with the return of pronghorn and elk, shows that the Northern Sierra is naturally rewilding, providing an important habitat and climate corridor for many species.

A few of the key plant species include the iconic giant sequoia, the glittering aspen, fragrant ponderosa pine, ancient bristlecone pine, the rare Washoe pine, the region's many ecologically and culturally important oaks, and the long list of forbs, grasses, and grass-like species that occupy the California Native Plant Society's inventory of sensitive species in the region.

As stated above, there are over 3,500 plant and 400 wildlife species in the Sierra Nevada proper, which means that the Sierra Nevada Region as defined by the CNRA includes even more species such as those identified and listed in the Department of Fish and Wildlife's [State Wildlife Action Plan](#), particularly the [conservation strategy for the Sierra Nevada](#); the USFWS' [Recovery Plan for Vernal Pool Ecosystems of](#)

[California and Southern Oregon](#), the [Department of Fish and Wildlife's Sierra Nevada Bighorn Sheep Recovery Program](#); the [USFWS's recovery plan for Gabbro Soil Plants of the Central Sierra Nevada Foothills](#); the Bi-State Action Plan; and other management documents such as the [Birds of Conservation Concern](#) list.

A few of the key habitats that we want to see sustained over time in the Sierra Nevada Region include meadows, wetlands, rivers, lakes and riparian areas, grasslands, vernal pools, oak woodlands, oak savannah, Sierra Nevada mixed-conifer forests, aspen stands, riparian forests and woodlands, seeps, springs, fens, chaparral, pinyon-juniper woodlands, and Great Basin sagebrush steppe, among a long list of others.

Question 2: Thinking about this region, what nature-based climate solutions are important to you?

- Improved protections for and management of public lands and waters
- Equitable access for all to public lands and waters
- Permanent conservation easements with willing landowners
- Strategic acquisition and conservation of key lands and waters
- Improve stewardship of private lands and waters
- Restoration of watersheds, meadows, wetlands, vernal pools, rivers and streams, forests and oak woodlands
- Prescribed fire and managed wildfire
- Protection of grasslands, oak woodlands, vernal pools grasslands, rivers and streams, meadows and forests as critical carbon stores and/or key biodiversity hotspots
- Prioritization of protecting and/or restoring important wildlife corridors and connections between protected areas
- Ensuring protection for agriculture consistent with biodiversity goals

Question 3: Thinking about recreation and access in this region, what types of places are important to you?

- Healthy, naturally varied and fire resistant forests; clean free-flowing streams and rivers; connected (non-fragmented) landscapes; extensive roadless and non-motorized areas; soft-surface trail connectivity; green corridors connecting urban and town centers to public landscapes; biodiversity for wildlife viewing, hunting and fishing; unimpeded natural viewsheds.
- Federal, state, and local public lands and waters. It is critically important that public lands and waters be managed in such a way as to be available for the enjoyment of all people consistent with law, policy, and sustainability principles.
- Lands and waters that are currently popular for recreation but that are under-resourced, such as the swimming areas along the Kern River.

Question 4: What is working in this region to conserve lands and/or coastal waters, implement nature-based solutions to climate change, or increase equitable access to nature and its benefits?

What is working in the Sierra Nevada Region to conserve lands and waters is:

- Land trusts working with willing landowners
- The National Park System
- The National Wilderness Preservation System
- Inventoried Roadless Areas
- National Scenic Trails (Pacific Crest Trail)
- The California State Parks system
- The National Wild and Scenic Rivers System
- The National Conservation Lands System
- State wild and scenic rivers
- Conservation easements
- Land acquisition efforts
- Public and private partnerships
- Improved land stewardship practices and wildlife habitat enhancement on private lands
- The various partnerships referenced in this letter
- Particular state agencies, including the Wildlife Conservation Board, the Sierra Nevada Conservancy, and the California Tahoe Conservancy
- The Department of Conservation's Land Trust Capacity and Project Development program, which has leveraged millions of dollars from a relatively small investment and advances the regional planning and capacity needed to achieve the State's climate resilience goals.

What is working in the Sierra Nevada Region to address climate change is:

- The protection of natural landscapes in parks, wilderness, and permanent easements.
- Ecological restoration of meadows and other lands impacted by overgrazing and other destructive activities (mining, timber harvesting, etc.).
- Efforts at the state and federal levels to reduce carbon emissions, including an increased focus on restoring fire as a natural disturbance process to lower emissions from future wildfires. This includes increased coordination and investment in prescribed burning.
- Efforts to increase carbon storage opportunities. Decreasing the intensity of commercial forest management to allow increased growth and carbon stocks is the greatest near-term opportunity to remove CO₂ from the atmosphere. "Middle aged" and older forests grow quickly and increase live carbon stocks in the near term. This is an immediate opportunity to increase carbon stocks in the next decade, and for longer term climate goals. California must continue to invest in both active forest restoration and permanent conservation of forest ecosystems, in which we are working to re-create more natural structure, including bigger, older, and more fire-resistant trees. Collectively, improving forest management (including increasing harvest rotation age and using selective harvesting methods), restoring forest cover in riparian areas, and restoring oak woodlands will create healthier forests that sequester carbon and are more resilient to fire, drought and climate change, with significant co-benefits. To ensure carbon sequestration increases over time, the state should prioritize and substantially increase ecological thinning and restoration actions where the benefits are secured with a reliable commitment to management that stabilizes and/or increases above ground carbon stocks, while simultaneously creating

structurally complex, diverse and resilient forests. Projects that provide multiple co-benefits such as water quality and security should also be prioritized.

- Better understanding of the role fire plays in managing forests and the negative effect of decades of suppression.

What is working in the Sierra Nevada Region to increase equitable access to nature and its benefits is:

- New acquisitions that offer public access, such as the public lands and waters acquired in the Tahoe National Forest in the “checkerboard” region and in the Granite Chief Wilderness.
- Land trusts working with public entities and private landowners to facilitate fee-title transfers to successfully create recreational open spaces like the Stockton Creek Preserve and Mariposa Creek Parkway in Mariposa.
- The maintenance of existing recreation facilities such as trails and campgrounds.
- Efforts to keep recreation activities on public lands free or affordable.
- Ongoing efforts by several schools, nonprofits, and others throughout the Sierra Nevada Region to connect youth to the wonders of nature and the outdoors, such as the SCION program.
- The Yosemite Area Regional Transportation System, which provides comfortable, economical, and convenient year-round transit service into Yosemite National Park from gateway communities.

Question 5: The State of California is committed to conserving 30 percent of its lands and coastal waters by 2030. What does conservation mean to you?

“Conserved” areas must be established with enduring (durable over the long-term) measures that support connected and intact habitats and thriving biodiversity, contribute to climate resilience, provide ecosystem services; managed and/or restored so that their natural character, resources, and functions exist for current and future generations; and 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. Examples of areas considered “conserved” under 30 by 30 include but are not limited to: areas acquired from willing sellers and managed for conservation and restricted from destructive development, land under permanent conservation easement or fee title with deed restriction, state parks, national parks, designated wilderness, lands within the Bureau of Land Management’s National Conservation Lands System, National Wildlife Refuges, state ecological areas, cultural monuments and state wildlife areas. To meet 30 by 30 goals there is an overarching need for funding, particularly for conservation of private lands.

Places that don’t meet this definition of conserved could still be very important for the state’s climate smart lands strategy as part of its climate resilience efforts and its goals for protecting biodiversity and improving equity, including access to nature, greener and more climate resilient communities, etc. Just because the state has a 30 by 30 goal does not mean that 70% of the state should be open for development and degradation. These areas could still be protected and many should be managed for biodiversity, climate, open space, and community benefits.

Question 6: Please describe the greatest challenges to conserving lands and/or coastal waters, implementing nature-based solutions to climate change, or increasing equitable access to nature and its benefits?

The greatest challenges to conserving lands in the Sierra Nevada Region are:

- The threat of poorly planned housing, sprawling development, land use conversion, subdivision and fragmentation of private natural and working lands, with the associated challenges of wildland urban interface
- Lack of adequate and sustained funding to support land acquisition, management, restoration, monitoring, science, and capacity building for partnerships, organizations, and Indigenous-led organizations working at the regional and local levels
- The threat of industrial development on both public and private natural lands
- Federal, state and local land management planning that does support conservation
- Climate change
- Lack of political will

The greatest impediments to using nature-based solutions to address climate change in the Sierra Nevada Region include:

- A lack of sustained funding from both state and federal sources
- Inadequate planning and coordination among stakeholders
- Lack of political will
- Support for conservation with land managers

The greatest impediments to increasing equitable access to nature and its benefits include:

- A lack of sustained funding from both state and federal sources
- Inadequate planning and coordination among land managers
- Lack of political will
- Systemic racism and other prejudices
- Lack of transportation to open spaces from communities in Fresno and Kern counties, among others. Some communities in the region, like Susanville, provide a model of transit to trails.
- Historical lack of outreach, management, infrastructure and exclusive interpretation that create unsafe or unwelcoming environments for people of color, such as at the many popular swimming areas along the Tule, Merced, Kern, and other streams on public lands near San Joaquin Valley communities.

Question 7: What does long-term success look like for nature-based climate solutions in this region?

- Sustained funding for the nature-based efforts to address climate change, protect biodiversity and create more equitable access to nature.
- Changes in land and water management practices that reduce impacts to the climate. Some examples include new wilderness, wild and scenic river, and other protective designations for

public lands, including those which will serve as climate refugia, proactive land management practices including Traditional Ecological Knowledge on both public and private lands, improved logging and road construction practices on private industrial forest lands and providing incentives to farmers and ranchers to increase their carbon storage, among a variety of other tools.

- Protection of the Sierra Nevada Region as long-term carbon store
- Catastrophic human-caused climate changes are reversed and prevented.

Question 8: What does success look like for 30 by 30?

- An aggressive 30 by 30 implementation plan that is well-funded and has a clear implementation structure.
- Traditional lands and sacred sites are returned to local Tribal groups for management.
- The vast majority of federal public lands in the Sierra Nevada Region are permanently closed to the threat of industrial development, including the construction of new roads. This will involve convincing Congress to designate many BLM and USFS wild lands as wilderness and protecting scores of streams as wild and scenic rivers.
- All native populations of plant and wildlife species in the region are ensured long-term population viability.
- Public land managers are provided with the resources they need to properly steward our lands and waters.
- Public lands are made more accessible and welcoming for communities of color.
- Private lands are managed in a more sustainable fashion and strong incentives exist to promote improved conservation measures.
- Sierra Nevada communities sustainably thrive and recognize that strong conservation and equitable access benefits all.

V. Achieving Equitable Progress Through 30 by 30

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

Sincerely,

Katie Hawkins California Program Manager Outdoor Alliance	Katie Goodwin California Regional Director Access Fund	Pamela Flick California Program Director Defenders of Wildlife
Michael J. Painter Coordinator Californians for Western Wilderness	Wendy Schneider Executive Director Friends of the Inyo	David Page Advocacy Director Winter Wildlands Alliance

Jora Fogg Executive Director Bodie Hills Conservation Partnership	Paul Hughes Campaign Coordinator Forests Forever	Darla DeRuiter, PhD Executive Director Friends of Plumas Wilderness
Steven Day Executive Director Legacy: The Landscape Connection	Jenny Hatch Executive Director Sierra Nevada Alliance	Elyane Stefanick California Program Director California Lands Foundation
Laura Cunningham Executive Director The Western Watersheds Project	Daniel Rossman CA Deputy Director The Wilderness Society	Benjamin Barry Southern Sierra Representative Pacific Crest Trail Association
Lynn Ryan California Co-Coordinator Ancient Forest International	Brittany Benesi Director of Gov't Affairs Sierra Business Council	Adam Livingston Director of Planning and Policy Sequoia Riverlands Trust
Ryan Henson Senior Policy Director California Wilderness Coalition	Janessa Goldbeck California State Director Vet Voice Foundation	Alexis Ollar Executive Director Mountain Area Preservation
Geary Hund Executive Director Mojave Desert Land Trust	Maria Mircheva Executive Director Sugar Pine Foundation	Betsy Reifsnider Sacramento Policy Associate Mono Lake Committee
Elena DeLacy Executive Director American River Conservancy	Dyane Osorio Mother Lode Chapter Sierra Club	Sam Davidson Communications Director Trout Unlimited
Kay Ogden Executive Director / CEO Eastern Sierra Land Trust	Sherry Pease Executive Director Foothill Conservancy	Kim Anaclerio Program Director Mammoth Lakes Recreation
Laurie Oberholtzer Executive Director Sierra County Land Trust	Colin Wood Director Snowlands Network	Manny Becerra Chair, Toiyabe Chapter Sierra Club
Brenda Ileana Gallegos Conservation Program Associate Hispanic Access Foundation	Gary Lasky Chair, Tehipite Chapter Sierra Club	Stephen Montgomery Chair, Kern-Kaweah Chapter Sierra Club
Daniel Gluesenkamp, PhD Executive Director California Institute for Biodiversity	Mehmet McMillan Executive Director WildPlaces	Pedro Hernández Outreach and Engagement Manager – Climate Policies Audubon California
Maureen Louise Forney N. CA Representative Great Old Broads For Wilderness	Mari Galloway CA Project Manager Wildlands Network	Lynn Boulton, Chair Range of Light Group / Toiyabe Chapter Sierra Club

Gary Ananian Executive Director Kern River Conservancy	Amy Merrill Interim Director, California Program American Rivers	Jeff Darlington Executive Director Placer Land Trust
John Svahn Co- Executive Director Truckee Donner Land Trust	Bridget Fithian Executive Director Sierra Foothill Conservancy	André Sanchez San Joaquin Valley Organizer WildPlaces
Mark Rose Sierra Nevada Program Manager National Parks Conservation Association		