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15 February 2022

30x30 California  
California Natural Resources Agency  
715 P Street  
Sacramento, California 95814

**Subject: Comments on the Draft Pathways to 30x30 Strategy**

**Summary of Comments**

The Western Section of the Wildlife Society conveys our support for California participating in the global effort to conserve 30% of lands by 2030 by embarking upon a State 30x30 initiative. Further, we applaud the 30x30 Strategy's approach of acknowledging and addressing the intertwined nature, and dependency of, the growth of California and the need for conservation as well as science-based decision making. However, we submit the following comments regarding strategy details that should be considered for refinement.

**The Basis for Comments by the Western Section of the Wildlife Society**

The Western Section of the Wildlife Society provides these comments on the California Draft Pathways to 30x30 Strategy . The Wildlife Society was founded in 1937 and is a non-profit professional society representing wildlife biologists, managers, and educators dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The Western Section of The Wildlife Society represents over 1,000 professional wildlife biologists residing in Nevada, California, Hawaii, and Guam. Our members have extensive experience in addressing conservation and management of public and private lands. Our professional training and experience provide a strong basis for evaluating the Draft Pathways to 30x30 Strategy.

**Protect Biodiversity**

Protecting areas that are connected to existing protected lands may increase the benefit of the newly protected areas. However, this goal should more directly address the importance, and opportunities for, connecting and maintaining movement corridors. Many areas may need to be protected to achieve the goal of interconnectedness, and they may not become available for protection in a linear fashion. Therefore, focusing

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solely on adjacent or linked lands may be too narrow, and rather should include the potential for connection. The inclusion of a conservation priority related to restoration of degraded habitats is critical, and acknowledged, but existing quality habitat should be prioritized over restoration of degraded areas if all else is equal.

### **Expand Access to Nature**

The pressure on existing public lands has continually increased, causing new stressors on wildlife.. An increase in trails within existing lands may result in increased habitat fragmentation, which is counterproductive to the goal of conservation. We need to relieve pressure on nature while providing experiences and opportunities for humans.

### **Mitigate and Build Resilience to Climate Change**

Managing conservation through the lens of climate change is critical to meeting the stated goals of California's 30x30 effort. Examples of the impacts of climate change, such as the prolonged fire seasons, increased intensity and size of wildfires, changing frequency of extreme weather events, sea level rise, and drought, should be specifically mentioned in this section.

### **Principles for Achieving JEDI**

A liveable wage in conservation fields is a major barrier to JEDI. It would be beneficial for the Strategy to more explicitly state this. We regularly lose aspiring and early career wildlife biologists due to the low wages prevalent in the conservation sector. Just this week, a committee member lost an incredibly talented young professional to the construction industry due solely to the need to earn a liveable wage.

Does "workforce development" include creating opportunities for people from "historically marginalized communities, communities of color, and California Native American tribes" to gain employment in natural resources management? The Strategy should ensure we are providing pathways for non-traditional individuals to join the conservation workforce, promoting jobs in these fields (starting with entry level) as "good" jobs and valued jobs. We shouldn't just be providing access to conserved lands, but providing access to jobs on those lands, working towards the conservation field workforce mirroring the diversity of California.

### **Strengthen Tribal Partnerships**

We support the inclusion, and recognition of, traditional ecological knowledge in meeting the 30x30 conservation goals.

### **Conservation Definition for 30x30**

The concise definition presented in the call-out box is comprehensive; however, we would like to see a more proactive approach to climate change and carbon sequestration in the supporting text. While it may be true that "Designations have not yet been established that emphasize climate benefits such as carbon sequestration or buffering climate impacts," why must the definition wait until this occurs to include it? Instead, the definition should be forward thinking and include these designations so that when lands are designated for climate benefits, the lands can immediately be recognized under the conserved definition of 30x30, not wait until the definition is refined to be counted. Further, the definition of conserved should direct what it means and help initiate the type of conservation California desires. By waiting until it has been applied to create the

definition, California is running the risk of the conditions dictating the definition instead of the definition dictating the conditions. The definition will be more resilient if it is forward thinking and may encourage the conservation of lands for climate benefits.

It is unclear how working lands are acknowledged under 30x30. The text acknowledges that working lands, particularly agricultural fields, provide important ecological functions while also generating food, but the presentation GAP status codes suggests that overall working lands are not valued through the lens of 30x30. Please clarify the intent of evaluating working lands. Multiple use lands are critical for meeting the acknowledgement of the intertwined nature of human health and wellness and conserved lands.

While reading for content, we couldn't help but notice that on the bottom of page 27 the icons and text are reversed.

### **Strategic Actions to Achieve 30x30**

#### *Execute Strategic Land Acquisitions*

Acquisition of currently unprotected lands is critical for meeting 30x30. Much work has been done to date to identify priority acquisitions (e.g., CDFW ACE, Correa Ayram et al. 2016), therefore, priority action 1.1 would be stronger if it built upon these works; however, as written, it suggests a new endeavor is necessary.

We support the approach of evaluating habitat for conservation, and including connectivity with other protected lands is important. Focusing solely on the total number of acres conserved is too narrow to meet the true goals of 30x30. To fully meet the objective of protecting California's unique biodiversity, the location of lands in relation to other protected areas will have an impact on their conservation value. To realize this concept, priority action 1.4 should include connectivity in the priority of new acquisitions, which is stronger than the strategic mention in action 1.5. A priority related to acquiring lands that are ecologically significant or support listed species would be beneficial. A focus on just the total acres conserved, runs the risk of conserving lands with little value to sensitive wildlife species. Evaluating and purchasing lands for their habitat value and connectivity will have the greatest impact for Californians and biodiversity.

The mention in priority action 1.6 regarding funding is critical, but should be strengthened. As part of any acquisition process, consistent funding needs to be identified for the management of the properties. Having positions to monitor, maintain, and enforce these new conservation investments will ensure the value of these new lands are being met and the conservation purpose realized. Mirroring priority action 3.1 with the acknowledgement of the need to expand capacity is one solution already present in this Strategy. This will also create entry-level and well-paying positions to invest in Californians, consistent with the stated Principles for Achieving JEDI.

#### *Grow voluntary private lands conservation program*

We commend the continued support for staff in existing conservation easement programs and recommend that the plan include mention of the need for funding (and positions), otherwise described as capacity to monitor and enforce the easement

conditions. This will allow the building of relationships with landowners, foster stewardship of California lands, and ensure that conservation easements are being maintained and goals met to fulfill the purpose of 30x30.

#### *Institutionalize Advance Mitigation*

We strongly encourage and support the inclusion of advance mitigation in this strategy. As noted, it can prevent loss and minimize impacts by removing the temporal break between habitat loss and habitat creation.

#### *Expand and Accelerate Environmental Restoration*

The priority actions presented in this section are much more specific than in previous sections, which appears to be limiting. For example, there is significant merit in removing barriers in waterways, but this strategy is myopic as roadways and other development in terrestrial habitats are also barriers to wildlife movement. Why not evaluate and remove barriers overall, both terrestrial and aquatic? Similarly, why are riparian and wetland habitats limited to restoration through flood protection tools and levee removal? Riparian and wetland restoration is a large field with many tools in the toolbox, and the full suite of opportunities should be acknowledged and promoted.

Priority action 8.10, restoring historic fire regimes (frequency and intensity), would benefit from refinement. In light of climate change, the prevailing professional opinion is that historic fire regimes are no longer appropriate or attainable, but rather management should focus on resilient landscapes through fire frequency and intensity (e.g., Coppoletta et al. 2019). This is somewhat captured through the parenthetical, but it can easily be misinterpreted. To allow for long-term relevancy and comprehension by a wide variety of audiences, we suggest reframing to “returning fire to the landscape as a management tool and restoring ecological processes to attain healthy, resilient landscapes.”

#### *Strengthen Coordination Among Governments and Key Partners*

Priority action 11.2 presents the concept of a consistent definition of conservation. While a conservation approach that is consistent with the federal government is desirable, it does lead to questions regarding impacts to the California approach. Does that mean that the definition presented earlier in the strategy document is subject to change? If so, how will changes to what lands are considered conserved be dealt with when calculating 30x30? If the definition is more restrictive, could lands be removed from the calculation? If the definition is more inclusive, and the goal is already met, would the strategies identified here still be pursued? Would there be additional public engagement in this process?

#### **Conclusion**

I appreciate the opportunity to offer comments on behalf of the membership of the Western Section of the Wildlife Society. Overall, we are very pleased with the steps California is taking to achieve 30x30 and hope that our constructive criticism will lead to a stronger strategy. We look forward to continuing our involvement in the process of conserving natural resources in California.

Sincerely,

A handwritten signature in black ink that reads "Kelly A. Holland". The signature is written in a cursive, flowing style.

Kelly Holland  
Chair, Conservation Affairs Committee  
Western Section, The Wildlife Society

**Literature Cited**

California Department of Fish and Wildlife (CDFW). 2022. Areas of Conservation Emphasis (ACE): <https://wildlife.ca.gov/Data/Analysis/ACE>

Coppoletta, M., H.D. Safford, B.L. Estes, M.D Meyer, S.E. Gross, K.E. Merriam, R.J. Butz, and N.A. Molinari. 2019. Fire regime alteration in natural areas underscores the need to restore a key ecological process. *Natural Areas J.* 39(2):250-263.

Correa Ayram, C.A., M.E. Mendoza, A. Etter, A, and D.R. Perez Salicrup. 2016. Habitat connectivity in biodiversity conservation: A review of recent studies and applications. *Progress in Physical Geography: Earth and Environment.* 40(1):7-37.