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 Wiyot Tribe’s Natural Resources Department and the undersigned conservation, recreation, and other organizations, we are writing to provide our initial recommendations regarding the development of the state’s 30 by 30 strategy, especially as it relates to natural lands and waters on the North Coast and adjacent regions.

As defined by the California Natural Resources Agency (CNRA), the “North Coast Region” consists of Lake, Mendocino, Humboldt, Trinity, Siskiyou, and Del Norte counties. The North Coast Region includes over 5.6 million acres of some of California’s most spectacular public lands and waters. These lands and waters are of incalculable value to plants, wildlife, and people.

In addition to the information and recommendations discussed below, as you develop the 30 by 30 Pathways Report, we urge you to review and consider the regional assessment of species and habitats as well as threats and opportunities, and the conservation strategy contained in the California Wildlife Action Plan for this region.

**Introduction to the North Coast Region**

The North Coast Region is characterized by large expanses of forested mountains and rugged river canyons that support important areas for biological diversity. The Klamath and Siskiyou Mountains and the northern Coast Ranges are recognized for their biological diversity and have been designated as an area of global biological significance by the World Conservation Union, as one of 200 global conservation priority sites by the World Wildlife Fund, and as a proposed United Nations’ biosphere reserve. This region’s major inland waterways include the Eel, Smith, Mad, Van Duzen, Mattole, Klamath, Scott, Shasta, Salmon and Trinity Rivers and Cache and Redwood Creeks that are centered in alluvial valleys that historically had supported freshwater marshes and grasslands. This region consists predominantly of conifer forests and oak woodlands dissected by chaparral, riparian forests, and wetlands. The region also includes valley and foothill grassland and woodland communities as well as coastal wetlands and marshlands. Along the coast, sandy beaches, estuaries, lagoons, marshes, and open water bays support important habitat for shorebirds and provide nursery habitats for anadromous, oceanic, and near-shore fish.
Most of the lands in this region are managed by the federal or state government, mainly the U.S. Forest Service (USFS) in the Mendocino, Klamath, Six Rivers, Shasta-Trinity, and a portion of the Rogue River-Siskiyou National Forests (NF), the Bureau of Land Management’s (BLM) Ukiah, Arcata, and Redding Field Offices, the National Park Service’s (NPS) Redwood National Park, and California Department of Parks and Recreation and State Lands Commission lands. These public lands are critical to protecting biodiversity, providing public access for recreation and enjoyment, and supporting local communities’ economies. Millions of acres of private natural and working lands are also essential to both the ecological health and the economic vitality of the North Coast Region. Indeed, much of the iconic coast redwood ecosystem is in private ownership despite decades of acquisition efforts, as are most of the region’s grasslands and majestic coastline.

The North Coast is the traditional homeland of many indigenous nations, including the Miwok, Pomo, Yuki, Wailaki, Cahto, Sinkoyne, Mattole, Nongatl, Wiyot, Pit River, Modoc, Lassik, Tsungwe, Wintu, Hoopa, Karuk, Shasta, Tolowa, and Yurok peoples, among others. Many of these Tribes practice land stewardship that extends back for millennia, including sustainably tending key plants and habitats with fire. Many Tribes, such as the Karuk and Yocha Dehe Nations, have active land stewardship programs that promote fire resilience, restore lands, and sustain and spread traditional ecological knowledge (TEK).

While some of the communities in the North Coast region are thriving, others face the consequences of systemic inequality: poverty, food insecurity and the ever-present risk of fire.

Millions of tourists visit the North Coast Region every year to enjoy its varied recreation opportunities. From its thousands of miles of trails and scenic byways to its dozens of developed and primitive campgrounds, the public lands of the North Coast Region offer world-class hiking, cycling, angling, hunting, camping, picnicking, swimming, whitewater boating, flatwater boating, birding, climbing, scenic driving, and a multitude of other outdoor activities. The health of the recreation economy is key to the communities of the North Coast Region and beyond.

Protected lands provide multiple values and benefits, including:

- **Critically important plant and wildlife habitat.** As is noted above, the region contains rich biodiversity. Within the inland mountain ranges, more than 3,000 plant species exist, including more than 30 temperate conifer tree species. Wildlife includes declining species such as northern spotted owl, northern goshawk, Humboldt marten, and Pacific fisher. This region also includes an incredible diversity of anadromous, estuarine, and inland fisheries.

- **Watershed protection and clean water.** The North Coast Region, and especially its public lands, serve as the source of many of California’s most important streams, including Cache Creek, Redwood Creek, and the Eel, Trinity, Mad, Van Duzen, Mattole, Salmon, Scott, upper Sacramento, McCloud, Shasta, and Smith Rivers. Much of the Klamath River’s length is also in the North Coast Region. In addition to surface waters, public lands also offer important subsurface water sources, such as the pristine volcanic
groundwater reservoirs associated with Mount Shasta and the Medicine Lake shield volcano.

- **Clean air.** Class I Airsheds as defined by the Clean Air Act exist in national parks and wilderness areas protected before 1977. In the North Coast Region, this includes the Marble Mountain and Yolla Bolly-Middle Eel Wilderness Areas and Redwood National Park. Under the law, this region should have the cleanest air in the nation.

- **Carbon sequestration.** The forests and lands of this 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.

- **A multitude of free or relatively inexpensive recreation opportunities.** In addition to providing opportunities for solitude, spiritual rejuvenation, improved health, and other personal benefits, outdoor recreation generates billions annually and is one of the most important contributors to the economic well-being of the North Coast Region’s communities.

- **Lands and waters of critical importance to many Indigenous peoples.** Tribes have managed ecosystems in this region for thousands of years and this active management has been an important part of creating this region’s rich biodiversity.

- **Historical and cultural resources that document history.** The region’s public lands include many important historical resources, including structures, trails, historic roads, and other features.

- **Unparalleled vistas that enchant visitors and enrich the lives of residents.** Tourism has become increasingly important, as this region’s stunning natural beauty and abundant recreational opportunities draw visitors from around the world. The Lost Coast, Redwood National and State Parks, coastal paths in Mendocino and uncrowded beaches along the North and South Spits of Humboldt Bay are just a few of the North Coast highlights to be explored in California’s least-populated coastal region. With millions of people visiting this region annually, conservation actions will provide increased opportunities for the use and enjoyment of this region.

- **Economic benefits to rural communities.** Increased conservation will also provide recreation opportunities for tourists who frequent this region and create jobs and revenue for local communities. According to the Visit California “Economic Impact of Travel in California 2011-2020” report, travel related spending within this region was $824.9 million, generating $78.8 million in state and local tax revenue and 12,870 jobs.

- **Food, wood products, and other goods and services.** Even the most strictly protected lands can provide goods and services, including wildlife, clean air and water, and
materials for non-commercial gathering.\(^1\) Well managed public lands can provide a sustainable supply of other goods as well.

**Challenges to the People and Environment of the North Coast Region**

Despite their irreplaceable values, some public lands, especially those managed by the USFS, BLM, and State Lands Commission, are open to multiple threats, including:

- Under-funding from Congress and the State Legislature
- Poorly planned or managed recreation use, often due to the constrained capacity of land management agencies
- Poor logging practices that remove the largest and most fire-resilient trees
- Development and destructive logging practices on adjacent private lands
- Industrial development, including proposed energy projects at sensitive places like the BLM-managed Walker Ridge\(^2\) in Lake County and the Medicine Lake Highlands in Siskiyou County’s Modoc NF
- Road building and habitat fragmentation
- Poorly managed grazing
- Widespread post-fire logging in already impaired watersheds
- Trespass cannabis cultivation
- Illegal dumping
- Sale or trade of land for development
- Disruption of the natural fire ecology
- Taking of plants and wildlife for profit
- Long-term damage and fragmentation from wildfire suppression tactics
- Mining
- Dams, water diversions, and other forms of water extraction
- Threats to source aquifers

Likewise, private natural and working lands are threatened by poorly planned urban development, poor logging practices, mining, road construction, energy development, overgrazing, cannabis cultivation in sensitive habitat areas, dams, water diversions and other forms of water extraction, the draining and diking of wetlands and salt marshes, the clearing of oak woodlands and other key habitats, invasive species (terrestrial and aquatic), and other activities that rend the ecological integrity of the landscape.

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\(^1\) We note that in this region and elsewhere Tribes who wish to harvest plants for traditional uses or hunt on their ancestral lands often have difficulties accessing federal and state lands. Compounding these barriers, some California laws and natural resource regulations are seen to obstruct the rights of Tribal members and indigenous people to practice their traditional hunting, gathering, and fishing rights ensuring the ability of Tribal members to practice and transmit their cultures.

\(^2\) A representative of the Yoche Dehe Tribe recently shared with some of us that in the Patwin language, Walker Ridge is Moluhk Loyuk or “Condor Ridge.” We are honored and pleased to start using that name for Walker Ridge here in a comment letter affecting Moluhk Loyuk for the first time.
Opportunities to Support Socially, Economically, and Environmentally Just Outcomes in the North Coast Region

1) Work with underrepresented and marginalized communities to develop and implement a strong definition of “equity” as well as measurable outcomes to guide this process. In addition to access to nature, 30 by 30 outcomes should meaningfully address systemic racism by providing representation, meaningful participation, and quality experiences/outcomes for historically-excluded and underserved communities.

2) Meaningfully consult with Tribes through a government-to-government consultation process to identify lands for co-management, land return, or ecological stewardship.

3) Support and fund increased staff capacity among Tribes to participate in government-to-government consultation and planning processes without impeding Tribal sovereignty. Timelines should be established in consultation with Tribes in accordance with their staffing capacity.

4) Change California’s fire-suppression regulations to increase the ability of Indigenous communities to conduct traditional burns.

5) Collaborate with Tribes associated with ancestral Wiyot lands; with federal, state, municipal, and nonprofit conservation land managers; and with other stakeholders in the Humboldt Bay region to connect and add to existing conservation lands and to extend landscape-scale conservation to the ecosystems of Humboldt Bay.

6) Work with Tribes to review, and change if necessary, state natural resource laws and regulations to recognize the rights of Tribal members and indigenous people to hunt, gather and fish.

7) 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.

Actions that should be taken to pursue 30 by 30 goals in the North Coast Region

1) Actively support current legislation in Congress and the State Legislature that pursues 30 by 30 goals for California’s lands and waters. For the North Coast region, it is especially important that the State actively support Representative Jared Huffman’s and Senator Alex Padilla’s Protecting Unique and Beautiful Landscapes in California (PUBLIC) Lands Act (S. 1459). The bill is also strongly supported by Senator Dianne Feinstein. It would be immensely helpful if state officials could aggressively push for the passage of this important legislation. We are hoping that the bill will get a hearing soon before the Senate Energy and Natural Resources Committee. It passed the House of Representatives in March of this year.
2) Support removal of antiquated dams on the Eel and Klamath rivers that obstruct fish passage without providing significant compensatory ecological benefits.

3) Urge Congress and the State Legislature to craft and pursue new legislative protections for California’s lands and waters. We are confident that, through input and collaboration from stakeholders and the public, Congress could carefully craft conservation measures that provide strong, durable protections for most of the key public lands and waters in the North Coast Region without adversely affecting existing recreation activities, closing off public access or interfering with critical infrastructure. There are many special places in the North Coast Region requiring protection. A few of the key lands and waters in the region that people have been struggling to protect for decades include:

- Black Butte River Proposed Wilderness, Mendocino NF*
- Cache Creek Proposed Wilderness Additions, BLM Ukiah Field Office**
- Chancelula Proposed Wilderness Additions, Shasta-Trinity NF*
- Chinquapin Proposed Wilderness, Shasta-Trinity NF*
- Eel River Wild and Scenic River, especially its estuary and dammed headwaters
- English Ridge Proposed Wilderness, BLM Arcata Field Office*
- Jackson Demonstration State Forest, Cal Fire
- Klamath River Wild and Scenic River
- Lake Earl in Del Norte County
- Mad River Buttes Proposed Wilderness, Six Rivers NF*
- Marble Mountain Proposed Wilderness Additions, Klamath NF**
- Mattole River watershed
- Medicine Lake Highlands, Modoc NF
- Moluhk Loyuk (Walker Ridge) proposed addition to the Berryessa Snow Mountain National Monument***
- Mount Eddy Proposed Wilderness, Shasta-Trinity NF**
- Mount Shasta Wilderness and surrounding region, Shasta-Trinity NF**
- North Fork Eel River Proposed Wilderness Additions, Six Rivers NF*
- Pattison Proposed Wilderness, Shasta-Trinity NF*
- Red Buttes Proposed Wilderness Additions, Klamath NF**
- Redwood Creek watershed, Humboldt County
- Redwoods to the Sea region from Humboldt Redwoods State Park to the King Range National Conservation Area**
- Russian Proposed Wilderness Additions, Klamath NF**
- Scott River, Siskiyou County
- Shasta River, Siskiyou County
- Siskiyou Crest region, Klamath and Rogue River-Siskiyou NFs**
- Siskiyou Proposed Wilderness Additions, Klamath and Six Rivers NFs**
- Smith River Wild and Scenic River watershed**
- South Fork Eel River Proposed Wilderness Additions, BLM Arcata Field Office*
- South Fork Trinity River Proposed Wilderness, Shasta-Trinity NF*
- Trinity Alps Proposed Wilderness Additions in the Klamath, Six Rivers, and Shasta-Trinity NFs* and BLM Redding Field Office**
• Trinity River Wild and Scenic River corridor and key tributaries*
• Underwood Proposed Wilderness, Six Rivers and Shasta-Trinity NFs*
• Yolla Bolly-Middle Eel Proposed Wilderness Additions in the Mendocino, Shasta-Trinity, and Six Rivers NFs and the BLM’s Arcata and Redding Field Offices*
• Yuki Proposed Wilderness Additions in the BLM Arcata Field Office and Mendocino NF*

*Included in Senator Padilla’s and Rep. Jared Huffman’s S. 1459, which the CNRA officially supports (see #1, above)

** Included in forthcoming BLM or USFS long-term land management plan development processes that would benefit from state engagement (see #5, below)

*** Included in Rep. John Garamendi’s Berryessa Snow Mountain National Monument Expansion Act (see #7, below)

4) Collaborate with Tribes associated with ancestral Wiyot lands; with federal, state, municipal, and nonprofit conservation land managers; and with other stakeholders in the Humboldt Bay region to connect and add to existing conservation lands and to extend landscape-scale conservation to the ecosystems of Humboldt Bay.

5) Actively engage in federal long-term land management plan development processes and other large-scale National Environmental Policy Act efforts, particularly those undertaken by the USFS and BLM. When participating in these processes, strongly encourage the federal agencies to pursue goals that are consistent with 30 by 30, such as retaining remaining old-growth trees and protecting areas without roads. In the North Coast Region, it is especially important that the state actively participate in the development of:

• Revised Land and Resource Management Plans for the Mendocino, Klamath, Six Rivers, Shasta-Trinity, and Rogue River-Siskiyou NFs. The USFS will start these planning processes in 2021. These National Forests cover over six million acres and include lands and waters of incalculable value to the public and Tribes like the Karuk, Yurok, Wintun, and several others.

• Revised Resource Management Plans (RMP) for the BLM’s Arcata and Redding Field Offices. This plan revision effort is called the Northern California Integrated Plan (NCIP). The BLM plans to initiate public scoping on NCIP in the fall of 2021.

• A management plan for the Berryessa Snow Mountain National Monument (BSMNM). The BLM’s Ukiah Field Office will initiate scoping for the RMP in late 2021.

6) Urge the USFS and BLM to identify and administratively protect high-value recreational landscapes such as Moluhk Loyuk (Walker Ridge) in Lake County, Horse Mountain in the Six Rivers NF, Medicine Lake Highlands in the Modoc NF, Mount Shasta Wilderness and surrounding lands in the Shasta-Trinity NF, the scenic corridors for the Pacific Crest National Scenic Trail, and the proposed Bigfoot National Recreation Trail, among other places.
7) Support Rep. John Garamendi’s Berryessa Snow Mountain National Monument Expansion Act that would add the Moluhk Loyuk (Walker Ridge) area in Lake County to the BSMNM. Walker Ridge is an important biodiversity hot spot of immense cultural importance to local Tribes like the Yoche Dehe.

8) Work with agencies and land trusts to identify strategically important private lands that can be acquired and protected or placed under a permanent conservation easement. Consider the protection and restoration of important habitat, migration corridors and connectivity, public access, equity, and other key factors when identifying priority lands. In the North Coast Region, it is especially important that the state help facilitate placing land in conservation management or ownership:

- Along all forks of the Eel River Wild and Scenic River.
- Lands along the proposed Great Redwood Trail that for many miles is in the Eel River canyon.
- The half-mile wide Trinity River Wild and Scenic River corridor. This would help mitigate the ongoing destructive impacts of the Central Valley Water Project’s Trinity River diversion.

9) Collaborate with local, state, federal, and private interests to secure public access to and improve conservation of scattered and isolated tracts of public land. In the North Coast Region, it is especially important to secure access to and improve the management of isolated BLM parcels that are currently closed to public use and difficult to manage because they are surrounded by private lands. There are many such lands in the Eel River watershed, for example.

10) Incorporate 30 by 30 goals into strategic wildfire planning efforts throughout the North Coast Region. 30 by 30 land protections should help re-establish mixed severity fire as an ecological process in appropriate habitats such as oak woodlands and mixed-conifer forests and should help North Coast communities become prepared for and resilient to wildfire. State officials should continue to participate in the FireScape Mendocino process, a collaborative stakeholder-driven effort of Tribes, residents, adjacent private landowners, local elected officials, recreationists, timber industry, conservationists, and others who discuss the future of fire management in the Mendocino NF. With its enormous size, long history of large fires, relatively low development on adjacent private lands, and local support for change, the Mendocino NF is an ideal place to explore new ways to restore fire-dependent and associated ecosystems and manage wildfire for long-term ecological and public benefits.

11) Work with CalFire to reduce the destructive impacts of fire-suppression on important natural lands such as parks and wilderness areas. CalFire must make efforts to rethink its aggressive fire-suppression tactics in remote and relatively unpopulated public and other natural lands that often leave the land scarred by bulldozer lines and other damage for decades. We were pleased to see that in the 2020 August complex fire on the Mendocino NF CalFire did not cause excessive damage while building fire lines in the Yuki Wilderness, Sanhedrin Wilderness, and other federal public lands on the western side of the August fire. However, neither CalFire nor the
USFS has done sufficient work to provide physical barriers needed to prevent bulldozer lines from becoming vectors for illegal vehicle use. Preventing illegal vehicle use is not only important in designated wilderness, but it is also critically important in areas that are vulnerable to trespass marijuana cultivation. CalFire needs to invest more resources into mitigating the damage it causes during fire-suppression efforts, especially the building of fire lines with bulldozers.

12) Work with livestock operators and land managers to facilitate voluntary grazing permit buyouts from willing sellers to administratively retire permits for conservation purposes.

13) Resolve the longstanding issue of the management of State Lands Commission parcels, especially where they exist as inholdings among other public lands. Ensure that the lands are conserved and connected to other protected parcels to the maximum extent possible. In the North Coast Region, this is especially important at Hams Pass in Mendocino County where lands rich with old-growth trees were transferred from the BLM to the State Lands Commission in the 1980s. After attempting to log the parcel but backing off in the face of public protest, the parcel has sat neglected and uncared for, left at the mercy of trespass cannabis growers. We ask that the state transfer the land to an entity that will sustain its ancient forest habitat.

14) Oppose proposed energy, old-growth logging, road construction, water diversion or extraction, or other projects on public lands that may destroy key habitat, impact source aquifers, increase carbon emissions, or harm communities.

15) Support eelgrass restoration projects in Humboldt Bay and Eel River and along the Mendocino Coast.

16) Support and expand the California Department of Fish and Wildlife’s (CDFW) North Coast Salmon Project to expedite and enhance efforts to recover endangered coho salmon in California. This project is initially focused in the Noyo, Garcia, Ten Mile, South Fork Eel, lower Eel, and Navarro Rivers, and Pudding Creek.

17) Work with Mendocino County residents and other stakeholders to develop and implement a management plan for the Jackson Demonstration State Forest that emphasizes the protection and restoration of mature forest and sustainable, well-managed recreation. Review the management of CalFire’s other State Forests to determine if their management plans should be made more consistent with 30 by 30 conservation and equity principles.

18) Urge Congress to appropriate sustained funding levels for the US Fish and Wildlife Service, BLM, USFS, 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.

19) Provide for adequate and sustainable funding for California state parks, wildlife refuges, and other conserved lands. In the North Coast Region, this is especially important for Sinkyone Wilderness State Park. This special part of California’s majestic Lost Coast has endured severe
under-funding over the years with the result that it suffers from illegal off-road vehicle use, dumping, trespass cannabis growing, and other problems.

20) Continue to actively assist, including with funding when possible, federal land managers, Tribes, non-profits, local governments, and others working to identify and cleanup sites on public lands impacted by trespass cannabis cultivation. In the North Coast region, the Mendocino, Six Rivers, Klamath, and Shasta-Trinity NFs have all suffered terribly from trespass grows. There has also been extensive harm to BLM and state lands. We also ask that you continue to assist in the effort to prevent the establishment of new trespass cannabis grow sites on public lands. As you know, these sites severely undermine California’s efforts to regulate cannabis production, sale, and use.

21) Designate the volcanic aquifers of Mount Shasta in the Shasta-Trinity NF and Medicine Lake Highlands in the Modoc NF as Outstanding National Resource Waters (ONRW) through a state-federal partnership. Currently, California’s only ONRW is Mono Lake even though there is a long list of worthy candidates.

22) 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.

23) Provide sufficient resources for the California Department of Fish and Wildlife (CDFW) to fulfill its mission, including staffing for law enforcement, 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).

24) Fully fund and implement the existing California Biodiversity Initiative to the maximum extent possible. This includes: 1) completing comprehensive specimen-based baseline biodiversity surveys, especially for lands owned or projects funded by the state; 2) identification and support for traditional Tribal practices that have sustained biodiversity for millennia; 3) inclusion of biodiversity goals as specific priorities for actions and criteria for evaluation of projects; and 4) inclusive capacity building opportunities to enable Tribes, local communities, and all Californians to contribute. It is imperative that such plans and initiatives, including 30 by 30, move forward assertively with concrete and transformative actions become a reality on the ground and within North Coast communities.

25) Work with the California Department of Transportation (CalTrans) to incorporate 30 by 30 principles into the management of our State Highway System and the other roads under the agency’s jurisdiction. Some of the key issues to discuss with the agency include providing for the passage of fish and other wildlife, the management of trees and other vegetation along roadways, maintaining or improving water quality, the retention of scenery important for regional tourism, and efforts to facilitate public access where state highways cross public lands, among other topics. CalTrans’ controversial efforts to maintain Highway 101 through mature and old-growth redwoods in Mendocino and Humboldt counties and recent extensive and possibly over-aggressive post-August fire clearing along State Highway 36 in Humboldt and Trinity counties
are just two of the many examples where CalTrans’ activities have inspired grave public concern and protest in the North Coast region.

26) Extend existing state financial support for the 1,600-acre Middle Creek Wetland Restoration Project on Clear Lake, and actively encourage the U.S. Army Corps of Engineers to prioritize this project.

27) Identify additional key public and private lands and waters that deserve protection or special management because of their superlative natural, hydrologic, cultural, or other values, or because they are needed to increase climate resiliency. It is particularly important to protect lands that include ecosystem types that are under-represented in the current network of protected lands such as oak woodland, chaparral, riparian areas, wetlands, wet meadows, estuaries, salt marshes, and other low-elevation habitat.

28) 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 this region stated that with additional resources, they could protect and manage an additional few 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. A key example of such efforts is the Mattole Field Institute’s Research, Education, and Resilience Training Center, which will provide on-the-ground education and resilience training within a partnership framework that includes university faculty, community-based groups, public land management agencies and private rural landowners, with a focus on engaging Indigenous students interested in natural resources conservation.

29) Work with private landowners, land trusts, and resource conservation districts to better protect biodiversity and promote fire-resilience on private “working lands,” especially private industrial timber lands.

30) Help local governments and Tribal nations implement 30 by 30 at the local level through general plans, elements, zoning, and other tools.

31) Educate 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 North Coast Region.
32) 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. Fundamental to the success of these programs is the creation of a welcoming environment for children of all backgrounds and experiences to interact with and experience oneness with nature.

33) 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 in the following locations:

- I-5 near Castle Crags
- I-5 Yreka to Oregon Border
- I-5/299 Intersection north to I-5/89 intersection
- Highway 101 elk crossings throughout Del Norte and Humboldt counties, but especially near Orick and Crescent City, which experience some of the highest wildlife-vehicle collisions in the state.

In addition, though the North Coast contains large expanses of rugged, forested mountains, both privately-owned and federally managed forests have been significantly fragmented by logging. The state should encourage private forest landowners and federal land managers to sustain and enhance connectivity between areas of high-integrity forest habitat. This is especially important in areas that support and facilitate movement for diverse focal species, including rare Humboldt marten, fisher, northern spotted owl, and marbled murrelet. Moreover, the state should engage in connectivity planning with the State of Oregon to strategize conservation actions that facilitate movement across borders, especially in the Klamath-Siskiyou region.

Responses to 30 by 30 CNRA Workshop Questions

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

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 North Coast Region as defined by the CNRA. A few of the many key wildlife species of concern in the region include the bald eagle, goshawk, pileated woodpecker, pine marten, Pacific fisher, grey wolf, mule deer, tule, Roosevelt, and Rocky Mountain elk, northern spotted owl, Shasta salamander, Del Norte salamander, and many critically important fish such as coho salmon and summer-run steelhead trout. A few of the key plant species include the iconic coast redwood, imperiled Port Orford cedar, fragrant ponderosa pine, the Mount Lassic lupine that grows only in the Six Rivers NF, the serpentine-loving Jeffrey pine, the region’s
many ecologically and culturally important oaks, and the extensive list of smaller plants that occupy the California Native Plant Society’s inventory of sensitive species in the region.

A few of the key habitats that we want to see sustained over time in the North Coast Region include meadows, grasslands, oak woodlands, mixed-conifer forests, aspen stands, riparian forests and woodlands, chaparral, wetlands, marine and estuarine environments, unique aquifers such as volcanic source waters of the Medicine Lake Highlands and Mount Shasta, beach dunes, and serpentine “barrens,” among a lengthy list of others.

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
- Conservation easements
- Strategic acquisition and conservation of key lands and waters
- Improved stewardship of private lands and waters.
- Use of fire as an ecological management tool.
- Protection of groundwater, especially volcanic source-aquifers
- Restoration of watersheds, meadows, wetlands, rivers, and streams
- Protection of important wildlife corridors and connections between protected areas.

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

- 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.

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?

- The National Park System (Redwood NP and Lava Beds National Monument)

- The National Wilderness Preservation System (Cache Creek, Cedar Roughs, Snow Mountain, Yuki, Sanhedrin, South Fork Eel, Yolla Bolly-Middle Eel, Chancelulla, Trinity Alps, Mount Shasta, Siskiyou, Marble Mountain, Russian, North Fork Eel, Mount Lassie, Rocks and Islands)

- The California Wilderness Preservation System (Murrelet, Redwood Heritage, Sinkoyne)

- The California State Parks system (Sinkoyne, Humboldt Redwoods, Jedediah Smith, Del Norte Redwoods, Tolowa Dunes, Anderson Marsh, Clear Lake, Azalea, Benbow, Grizzly
Creek, Harry Merlo, Humboldt Lagoons, John B. Dewitt, Little River, Patrick’s Point, Richardson Grove, Trinidad, Pelican)

- The National Wild and Scenic Rivers System (Klamath River, Black Butte River, Eel River, Trinity River, Smith River)

- BLM National Conservation Lands System (Cedar Roughs, Cache Creek, South Fork Eel, Yolla Bolly-Middle Eel, Yuki, Middle Fork Eel, King Range, Cascade-Siskiyou, Berryessa Snow Mountain, Eden Valley)

- State wild and scenic rivers (Eel River, Gualala River, Trinity River, Klamath River, Cache Creek)

- National Monuments (California Coastal, Berryessa Snow Mountain, Lava Beds, Cascade-Siskiyou)

- Conservation easements such as the Eel River Peninsula Project

- Land acquisition efforts such as The Wildlands Conservancy’s ongoing effort to acquire the Lone Pine Ranch on the Eel River in Mendocino County

- Improved stewardship practices and wildlife habitat restoration and enhancement on private lands

- The application of TEK.

What is working in the North Coast Region to address climate change?

- The protection of natural landscapes in parks and wilderness, and other ways.

- Improved practices on private lands

- Efforts at the state and federal levels to reduce carbon emissions such as by working with private landowners in Mendocino County’s Brushy Mountain area to change conservation and emission management practices. 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 North Coast Region to increase equitable access to nature and its benefits?**

- New acquisitions that offer public access such as the ongoing Land and Water Conservation Fund purchases of private lands inside the Mendocino NF
- 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 North Coast Region to introduce underprivileged and historically-excluded youth to the wonders of nature and the outdoors. The BLM’s Arcata Field Office sets a particularly fine example of working with local schools to introduce youth (many or most of whom meet state definition of “underprivileged”) to such wonderlands as the Headwaters Forest Reserve and King Range National Conservation Area.

**What does conservation mean to you?**

“Conserved” areas must be established with enduring (durable over the long term) measures, support thriving biodiversity, contribute to climate resilience, provide ecosystem services, and be managed and/or restored so that their natural character, resources, and functions exist for current and future generations. For example, conserving biodiversity includes establishing comprehensive baselines for species present, and then both managing and monitoring outcomes to ensure those species are conserved.

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 deed restriction, state parks, national parks, designated wilderness, lands within the BLM’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.

It is especially important that the state use the 30 by 30 process to urge Congress and the White House to improve the conservation of California’s federal public lands. No federal public lands
should be considered “conserved” so long as ancient, fire-resilient trees can still be logged, and wild places are still subject to development.

Places that do not 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 percent of the state should be open for development and degradation. These areas could still be protected and managed for biodiversity, climate, open space, and community benefits.

**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 North Coast Region are:

- Lack of adequate and sustained funding from both state and federal sources to support land acquisition, management, restoration, monitoring, science, and capacity building for partnerships, organizations, and tribes working at the regional and local level.
- The threat of industrial development on both public and private natural lands
- Climate change
- Generational change, in which a substantial number of private parcels owned by older Californians will change hands as they are sold, inherited, or otherwise disposed of. This presents both threats and opportunities for conservation.
- Lack of political will
- Lack of funding for land return to Tribes and Tribal land stewardship
- The threat of poorly planned development, land use conversion, subdivision, and fragmentation of private lands with the associated challenges of wildland urban interface.

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

- A lack of sustained funding from both state and federal sources
- Inadequate planning and coordination among stakeholders
- Lack of political will
- Institutional resistance to conservation and equitable access from certain public 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
- Failure to provide funding to Tribes for their meaningful engagement in the 30 by 30 process
- Inadequate planning and coordination among land managers
- Lack of political will
• Racism and other prejudices
• A narrow interpretation of equity that fails to incorporate essential components, such as representation, meaningful participation, quality experiences/outcomes
• Failure of the state to prioritize addressing systemic inequities in a way that provides truly systemic change
• Failure to establish shared definitions of crucial terms such as “equity” and “cultural resource”

**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.
• Changes in land and water management practices, including the use of TEK that ultimately reduce the impacts to the climate and the communities inhabiting the North Coast region.
• Catastrophic human-caused climate changes are reversed and prevented.
• Baseline data for biodiversity and other factors, against which outcomes of actions can be measured.

**What does success look like for 30 by 30?**

• All native populations of plant and wildlife species in the region are protected from extinction.
• An aggressive 30 by 30 implementation plan that is well-funded and updated periodically with clear interim goals.
• Public land managers are provided with the resources they need to properly steward our lands and waters.
• Public land managers are given sufficient resources to provide for and sustain equitable access for all people to our public lands and waters.
• Private lands are managed in a more sustainable fashion and strong incentives exist to promote improved conservation measures.
• Our North Coast communities sustainably thrive and recognize that strong conservation and equitable access benefits all.
• Key aquifers are protected.
• Considerable progress is made against human-caused climate change
• Funding for Indigenous stewardship of lands and the preservation of TEK

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,

Ryan Henson  
Senior Policy Director  
California Wilderness Coalition (CalWild)  
3313 Nathan Drive  
Anderson, CA 96007  
530-365-1455  
rhenson@calwild.org

Kimberly Baker  
Executive Director  
Klamath Forest Alliance  
2274 Eastern Avenue  
Arcata, CA 95521  
707-834-8826

Amanda Barragar  
Representative  
Trinity County SAFE  
PO Box 322  
Junction City, CA 96048  
530-355-4739  
amandabarragar@gmail.com

Michelle Berditschevsky  
Founder  
Mount Shasta Bioregional Ecology Center  
P.O. Box 1143  
Mount Shasta, CA 96067  
530.446.4462  
mountshastamichelle@gmail.com

Flora Brain  
King Range Alliance Coordinator  
Mattole Restoration Council  
29230 Mattole Road  
Petrolia, CA 95558  
(707) 629-3514  
flora@mattole.org
Victoria Brandon
Chapter Chair
Sierra Club Redwood Chapter
PO Box 466
Santa Rosa CA 95402
vbrandon95457@gmail.com
707 994 1931

Adam N. Canter
Natural Resources Director
Wiyot Tribe Natural Resources Department
Table Bluff Reservation
1000 Wiyot Drive
Loleta, CA 95551
707-972-0065
adam@wiyot.us

Mike Cipra
Executive Director
Friends of the Dunes
P.O. Box 186
Arcata, CA 95518
707-444-1397
mike@friendsofthedunes.org

Laura Cunningham
California Director
Western Watersheds Project
PO Box 70
Beatty NV 89003
775-513-1280
lcunningham@westernwatersheds.org

L. Steven Day
Director
Legacy: The Landscape Connection
P.O. Box 904
Ukiah, CA 95482
707-272-1323
lsteven.day@gmail.com
Ellen Drell
Director
Willits Environmental Center
630 South Main Street
Willits, CA 95490
wece@sbcglobal.net
707-459-4110

Dave Feral
Founder
Mad River Alliance
P.O. Box 1252
Blue Lake, CA
dferal@madriveralliance.org
707-382-6162

Mari Galloway
California Program Manager
Wildlands Network
2501 Capitol Avenue
Sacramento, CA, 95816
209-373-9973
mari@wildlandsnetwork.org

Larry Glass
President
Northcoast Environmental Center
PO Box 4259
Arcata, CA 95518
707-822-6918
larryglass71@gmail.com

Daniel Gluesenkamp, PhD
California Institute for Biodiversity
1440 Shattuck #12 PMB 101
Berkeley, CA 94709
925-631-2481
daniel@calalive.org

Alicia Hamann
Executive Director
Friends of the Eel River
PO Box 4945
Arcata, CA 95518
707-798-6345
alicia@eelriver.org
Katie Hawkins
California Program Manager
Outdoor Alliance California
11260 Donner Pass Rd. C1 - 117
Truckee, CA 96161
530.414.0388
katie@outdooralliance.org

Paul Hughes
Executive Director
Forests Forever
1936 University Ave. #160
Berkeley, CA 94704
paul@forestsforever.org
415/974-3636

Tracy Katelman
ForEverGreen Forestry
712 Main Street, Suite 201
Woodland, CA 95695
707-845-8579
tracy@forevergreenforestry.com

Michael Kauffmann
President
Bigfoot Trail Alliance
PO Box 777
Bayside, CA 95524
www.bigfoottrail.org

Delia Bense-Kang
Northern and Central CA Regional Coordinator
2215 Sunset Ridge
McKinleyville, CA 95519
dbense-kang@surfrider.org
707-497-8866

Cheryl Lisin
President
Friends of the Lost Coast
P.O. Box 69
Whitethorn, CA 95589
707-986-7138
David Page  
Advocacy Director  
Winter Wildlands Alliance  
PO Box 100-460  
Mammoth Lakes, CA 93546  
310-339-9069  
dpage@winterwildlands.org

Lynn Ryan  
California Coordinator  
Ancient Forest International  
PO Box 1850  
Redway, CA 95560  
lynnr8@gmail.com

Sandra Schubert  
Executive Director  
Tuleyome  
622 Main Street, Suite 200  
Woodland, CA 95695  
202-329-8648  
sschubert@tuleyome.org

Elyane Stefanick  
California Program Director  
Conservation Lands Foundation  
315 Noe Street  
San Francisco, CA 94114  
elyane@conservationlands.org  
415-663-6278

Thomas Wheeler  
Executive Director  
Environmental Protection Information Center (EPIC)  
145 G. St., Suite A  
Arcata, CA 95521  
707-822-7711  
tomi@wildcalifornia.org