

OUTDOOR ALLIANCE CALIFORNIA

February 15, 2022

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

Via email: Californianature@resources.ca.gov

Re: Outdoor Alliance California Comments on *Draft Pathways to 30x30 Strategy and Regional Opportunities*

Dear Deputy Secretary Norris,

Thank you for the opportunity to comment on the draft Pathways to 30x30 Report (Draft Report). These comments are in addition to joint regional comments submitted separately by a coalition of partners, including Outdoor Alliance California, regarding the Draft Report as it relates to the Sierra Nevada region, as well as joint comments from the statewide coalition of conservation and equitable access organizations. Outdoor Alliance California and its member organizations—Access Fund, American Whitewater, California Mountain Biking Coalition (CAMTB), International Mountain Bicycling Association (IMBA), Surfrider Foundation, and Winter Wildlands Alliance—represent tens of thousands of human-powered recreationists across the state of California: climbers, paddlers, surfers, mountain bikers and skiers working together to achieve robust land protections, equitable access to public lands and waters, nature-based climate solutions, shared stewardship, and sustainable recreation management on public lands.

I. Key Takeaways for the 30 x 30 Process

The Draft Report is a great first step in the broader effort to fulfill the Governor's executive order on climate and biodiversity (EO N-82-20) and to expand equitable access to nature's benefits. We strongly support these goals and share the sense of urgency articulated in the "Call to Action" segment of the Report. We appreciate the explicit recognition in the Draft Report of the difficulty and complexity of balancing access to recreation with the protection of biodiversity and habitat. We also appreciate the core commitments to justice, equity, diversity and inclusion, to improving partnerships with California Native American tribes, and to protecting economic prosperity. Our goal with these comments is not to repeat the joint comments from the coalitions mentioned above, but rather to highlight the synergies between some of the high-level strategies articulated

in the Draft Report and specific actions that the state can take to achieve 30x30 goals through improving sustainable recreation management and planning on both state and federal public lands. We have also included a brief but illustrative list of specific recreation access and conservation projects of the sort that we believe the state should engage with and prioritize as part of its broader 30x30 strategy (see Appendix A).

II. Definition of Conservation and Counting Progress Towards 30x30

The Draft Report defines conserved areas as “Land and coastal water areas that are durably protected and managed to support functional ecosystems, both intact and restored, and the species that rely on them.” The Draft Report also provides greater detail on the areas that qualify as protected under this definition. We are generally supportive of this definition of conservation, but we find the Draft Report to be unclear about how California’s 30x30 effort might affect human-powered outdoor recreation, how improved sustainable recreation management can in itself help to achieve many of the goals as stated, and how some actions might or might not be counted towards the overall 30x30 goal.

First, In reference to the U.S. Geological Survey’s Gap Analysis Program (GAP), the Draft Report states that “GAP status codes 1 and 2 are consistent with our definition of conservation.” The outdoor recreation community has a long history of advocating for protections that meet the criteria for GAP status 1 and 2, and we strongly support efforts to vigorously increase these protections. At the same time, we see a need and an opportunity—acknowledged implicitly in language of EO N-82-20—to expand protections outside of those parameters. A challenge with the 30x30 goal and the definition of protection is the question of the role and importance of imperfect protections. In our subjective assessment, many protections assigned to GAP status code 3 do an excellent job of protecting conservation values, and plainly there is incremental value in these imperfect protections relative to other possible management regimes. For example, National Recreation Areas are categorized as GAP status 3 despite there being no uniform definition or management prescription for NRAs; pursuing more conservation-focused management prescriptions for some NRAs (or portions of NRAs) may be desirable, but changing the type of designation itself could well be a big and controversial lift for minimal actual effective conservation gain. The same holds true for many other administrative designations and management scenarios on public lands, including Inventoried Roadless Areas (IRAs), Near Natural Areas, Backcountry Management Areas, National Scenic Trail corridors (Pacific Crest Trail) and others (see Section IX below). We encourage the state to establish clear metrics and incentives to also prioritize—and wherever possible enhance—these more flexible protections as part of a holistic 30x30 strategy.

Second, the State of California should commit to working closely with the human-powered outdoor recreation community to ensure that new GAP 1 and 2 protections do not adversely affect important outdoor recreation resources. While our community is generally supportive of GAP 1 and 2 designations, certain important outdoor recreation resources and access opportunities—such as,

for example, sustainable mountain bike trails—may not be compatible with specific GAP 1 protective designations such as Wilderness. This does not mean that there are not important alternative designations that allow for sustainable recreational activities and access while also providing significant and durable protections. Our experience has been that close collaboration with a broad range of stakeholders in the conservation, science, sustainable recreation, and land management communities can produce outcomes that are dually beneficial for conservation and outdoor recreation. The final report should include a commitment to further collaboration with the outdoor recreation community to enhance public land protections and sustainable management strategies across the state in line with 30x30 goals.

Third, it is unclear how many of the strategies outlined in the Draft Report will actually count towards the 30x30 goal if only GAP 1 and 2 protections qualify as “conserved.” The Draft Report includes a long list of thoughtful, greatly-needed actions such as ecological restoration goals, commitments to land stewardship, and strategies for increasing equitable access to the outdoors. We recommend that the final report make a more clear connection between these important actions and how they will support California’s overall 30x30 goal.

Fourth, something that could benefit from further clarification, and perhaps revision over time, is one of the definitions on page 26 for “Durably protected or managed areas.” These are to include “[a]dministrative conservation designations that have gone through a formal rulemaking or other enforceable decision-making process not subject to simple reversal.” We’d like to see a better, more specific inventory of the relevant processes—eg. land management plan revisions, Over-Snow Vehicle (OSV) use designations, etc.—as well as a better definition of “simple reversal.” We’d also like to see an exploration of areas where land designations subject to “simple reversals”—for lands that would otherwise meet the 30x30 criteria—might have that reversibility changed legislatively or administratively. Such a tool could help reach the 30x30 goal for lands that already support biodiversity, climate resilience, and access to nature.

Finally, we recommend that the final report examine how California’s role in oil and gas permitting might affect outcomes in the 30x30 process. The Draft Report does not reference state onshore or offshore oil and gas permitting, even though these activities affect the climate resilience goals expressed in Executive Order N-82-20. The final report should consider the impacts of oil and gas development on biodiversity, climate, equity, and outdoor access, and should include strategies to address these impacts.

III. Equitable Access to Outdoor Recreation

Executive Order N-82-20 directs CNRA to “advance equity and opportunity for all regions of California.” We are pleased to see that equitable access to the outdoors is thoughtfully incorporated into most aspects of the Draft Report, and that the Draft Report includes tangible

commitments, goals, and strategies that would advance justice, equity, diversity, and inclusion through the 30x30 process.

The outdoor recreation community is made up of individuals for whom time spent in the outdoors has been formative and meaningful. Far too many people and communities in our country have been historically excluded from these opportunities and lack safe, quality opportunities for recreation close to home. Systemic racism, particularly around access to the outdoors and the sometimes violent and racist history of public lands, has excluded Black, Indigenous, and communities of color from many of the benefits of public lands. We strongly support an inclusive approach to 30x30 to ensure that implementation decisions are not just made equitably and inclusively, but support direct benefits to communities that have been denied or lack ready access to the outdoors. This approach is just and will also help to build the broad support necessary for 30x30's success.

We view the appropriate use of Other Effective Area-based Conservation Measures (OECMs) as one strategy to advance equitable access through the 30x30 process, and we are pleased to see OECMs called out specifically in the Draft Report. We encourage the State of California to more thoroughly explore how conservation of OECMs like frontcountry recreation areas, urban parks, greenways, and connected regional soft-surface trail networks can contribute to the 30x30 goal. In part, we see incorporation of OECMs into the 30x30 framework as important for ensuring that local parks, urban green infrastructure, connected communities and other resources with a focus other than biodiversity conservation, but which nevertheless provide incremental benefit for species conservation and climate mitigation, “count” in some fashion and are incorporated into 30x30 planning. This approach will also support a more adept application of 30x30 in geographies like the Central Valley or the urban Los Angeles basin, that lack significant public lands acreage or access but are important from an equity perspective. This emphasis will allow those communities to enjoy the direct benefits of 30x30 implementation.

IV. The Role of Trails in 30x30

Recreational Trails must be a key element of the *Principles for Achieving Justice, Equity, Diversity and Inclusion*,¹ in that they are multi-benefit, and can meet all five of the outlined principles.

Underserved, park-poor communities with little access to outdoor recreation opportunities are also among the poorest in terms of biodiversity and habitat connectivity. The creation of multi-use natural- or soft-surface trails where feasible through and around these park-poor communities would have tremendous benefits to habitat connectivity. An example of this can be seen in the San Gabriel Valley Greenways Project (see Appendix A), which aims to improve trail access and recreational opportunities along the river corridors and stormwater channels that criss-cross the San Gabriel Valley. The proposed conversion of these storm water channels into linear parks are a multi-benefit solution, providing enhancements to habitats and bio-

¹ Draft Report, p. 19

connectivity, recreational opportunities, and the concurrent mental and physical health benefits, and provide alternative transportation routes for commuters. Such a project, with trails at its core, is a perfect example of the type of project we'd encourage under the 30x30 initiative.

Trails and trail-based recreation can improve wildfire management. Natural-surface trails and constructed fire roads can serve to advance wildfire resilience, as they provide both access to, and breaks from, fires. There are several examples of recreational trails and fire roads providing wildland firefighters backcountry access to fire fronts, for establishing fuel breaks, or for the trails/roads themselves to serve as fuel breaks. Future trail planning initiatives would benefit from the consideration of their potential to support wildland firefighting efforts and forest health, as well as the application of prescribed fire where appropriate. One need only look at the 2017-2021 Sierra or the North Bay wildfires to see the examples of the benefits of trails in enabling firefighters to access remote areas for effective fire suppression.

With well-planned and ecologically appropriate alignments and designs, trails can be tools to protect sensitive species. By designing trails that steer trail users away from sensitive species and habitats, and that discourage the proliferation of informal, high-impact, user-created trails, those habitats and species can be better protected. It is necessary to plan trails that not only avoid sensitive habitats, but that incorporate sustainable construction techniques and design to minimize trail impacts to those habitats. Interpretive opportunities can also be employed where appropriate to enhance the public understanding of our role in the ecosystem and how we can help protect those species. We also realize that there are many sensitive habitats that are incompatible with trail-based recreation. These habitats can be relieved from recreational pressure by the provision of sustainable trail networks in other areas that are appropriate.

Trails to support Conservation Priorities

Among the *Conservation Priorities to Increase Access To Nature*, we fully support the inclusion of "Increase access points and trails within existing natural areas including coast areas and urban rivers" as the third of five priorities. However, we hope this specific language does not preclude the same for future natural areas, either designated, acquired, or restored, in the course of reaching the goals of 30x30. Some trail networks within our state are already at or over capacity, especially with the increase in use over the last two pandemic years. Some areas and networks have seen severe impacts from increased use, being "loved to death." While demand for trails has grown, along with a proliferation of social trails, well-planned and sustainable new trail opportunities have been minimal at best over the decade. It can be exceedingly difficult and expensive to build trails in California. More focus at the state level to help promote, encourage, and coordinate sustainable trail development across multiple land management agencies around the state is needed, over and above the work State Parks is already doing.

The fifth Conservation Priority, calling for a "*wide variety of outdoor recreation experiences*" must be considered with respect to trails and all recreational infrastructure. Multi-use trails and facilities that serve more than one user group should be given priority. Trails are more than just a strip of dirt or a pathway to follow. They are the experience of a sense of place, a means of connecting with nature and all its benefits, a way to explore, to discover, and to improve one's quality of life through healthy outdoor activities. Well-built and sustainable trails need to be available to all Californians. Tools such as sustainable design, alignment, and construction need to be incorporated into all trails in order to maximize allowable uses and minimize impacts and maintenance needs, especially in light of the more extreme weather events we are experiencing. Management tools such as seasonal closures, time-restrictions, or time-differentiated uses can be explored to maximize opportunities to recreate while protecting habitats, biodiversity, and climate resilience.

Similarly, trails and outdoor recreation in natural settings are a necessary component of any conservation effort. People who have access to trails and outdoor recreation are more inclined to support stewardship efforts or take measures to protect those natural settings. We must increase efforts to foster the next generation of land stewards.

Trails as a tool for Economic Prosperity

We are delighted to see the *Principles for Safeguarding our Economic Prosperity* included in the draft document.² California's Outdoor Recreation Economy generates \$92 Billion in annual spending, 691,000 jobs statewide, and brings \$13.3 Billion in out-of-state spending to California (*Outdoor Industry Association, 2021 report*). California's iconic trails and natural landscapes attract outdoor recreation enthusiasts from all over the world. Recreation and tourism are key economic drivers in many recreation hotspots around California. Many smaller rural communities have become increasingly dependent on the recreation economy, as extractive uses of public lands have been reined in over the past several decades. An example of this is the Connected Communities initiative led by the Sierra Buttes Trail Stewardship (see Appendix A). This effort to revitalize the economies of 15 rural towns through trail-based recreation is a perfect example of the nexus between recreation, landscape restoration, fire and climate resilience, equitable access, and economic prosperity.

V. Climbing Management and Stewardship

Rock climbing is an increasingly popular recreational activity across the United States. There are many important rock climbing destinations in California both on federal and state managed lands. Generally speaking, the lack of climbing management guidelines, combined with a measurable increase in visitation levels, has resulted in the degradation of many California climbing resources and natural areas that are in need of stewardship attention. These areas can

² Draft Report, p. 22

be protected, restored, and enhanced to provide optimal recreation experiences as well as habitat restoration through erosion control, trail work, fixed anchor replacement, waste management initiatives, parking solutions, and other stewardship efforts. Non-profit organizations such as Access Fund and its Conservation Team stand willing and able to help steward and restore California's climbing areas.³

There is an ongoing need for land managers to first acknowledge climbing as a legitimate and appropriate use, followed by management strategies to protect sensitive natural and cultural resources while allowing for sustainable rock climbing access. Climbing resources, similar to other recreation resources, are not defined by merely the geology, but also the viewshed, airshed, soundscape, biodiversity, natural and cultural resources, and traditional values. A more balanced approach to multi-use planning for public lands is needed. Better integration of the recreation community in resource public planning processes would benefit land managers, the environment, and recreation enthusiasts by avoiding multiple use conflicts that often extend administrative processes and impair recreation experiences. There are numerous local and national nonprofit organizations dedicated to supporting sustainable management and stewardship of rock climbing destinations and eager to support land managers in this work. The climbing community is very supportive of strategies that protect sensitive species while allowing tailored access. A great example of this is the climbing community's dedication to supporting seasonal closures to protect nesting raptor sites.⁴

VI. Restoring freshwater systems

We are concerned at the lack of detailed consideration of natural freshwater systems in the Draft Report despite the fundamental importance of these systems to the conservation of biodiversity, to the provision of clean drinking water and recreational benefits for all Californians, as well as the vulnerability of these systems to climate change.

A. Wild & Scenic Rivers

Wild and Scenic River designations are durable protections for California rivers that possess outstandingly remarkable natural, cultural, and recreational values. Since the passage of the National Wild & Scenic Rivers Act in 1968 and the California Wild and Scenic Rivers Act in 1972, more than 2100 miles of our state's riparian habitat have been protected for the benefit and enjoyment of present and future generations. In addition, more than 700 miles may be added to the National Wild & Scenic River System under the Protecting America's Wilderness and Public Lands Act pending passage in the Congress.

³ <https://www.accessfund.org/meet-the-access-fund/our-approach/stewardship-conservation>

⁴ Access Fund Climbing and Raptor Management Handbook <https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>

Yet the Draft Report does not make clear that Wild and Scenic Rivers across the state of California are included under protected landscapes. These rivers are neither identified directly, nor can their location be discerned from the GAP 1 shaded areas on the Conserved Lands and Coastal Waters maps found in the Draft Report⁵ and on the corresponding maps in Appendix A. Along with enhancing conservation of existing public lands, it is important to understand where these watersheds exist and how they can connect to protected landscapes. We recommend that the Draft Report specifically identify these river reaches and include them in baseline information.

Currently there are a total of 33 Wild and Scenic River designations in California. Twenty rivers are protected under the National Wild and Scenic Rivers System, seven under State designations, and six under both national and state designations. We recommend highlighting these Wild and Scenic River reaches on the Conserved Lands and Coastal Waters maps separate from the GAP 1 land designations. GIS information including outstandingly remarkable values (ORV) should also be provided in the CA Nature database. We advocate that the California Natural Resource Agency, as lead State agency for the California Wild & Scenic Rivers System, provide information detailing the ORVs and GIS mapping for rivers designated under the California Wild and Scenic Rivers Act.⁶ Additionally, the National Wild and Scenic Rivers Coordinating Council can serve as a resource for technical assistance and GIS information for Nationally designated rivers.⁷

Finally, there are California rivers that are not designated, but which meet eligibility criteria for the National Wild and Scenic Rivers System, that are identified through processes for the revisions of federal land use management plans. Currently, U.S. Forest Service Region 5 is completing the Wild & Scenic Rivers Eligibility Inventory for the Sierra & Sequoia National Forest Plans and must do so for 10 pending National Forest Management Plan revisions in California. Elsewhere, the Bureau of Land Management is updating their inventory of eligible rivers in the Northwest California Integrated Resource Management Plan, which will replace the RMP for Arcata and Redding. Rivers that are identified eligible or recommended as suitable rivers through these processes are subsequently managed by the agencies to maintain free flow and protect for identified outstandingly remarkable values that are unique, rare, or exemplary. These planning processes and others like them should be included among the strategies for leveraging and engaging federal partnerships (see Section IX below), as well as in the Draft Report list of Other Effective Area-Based Conservation Measures (OECMs) that can be evaluated for their contributions to California 30x30 objectives.

⁵ Draft Report, p. 33

⁶ CA Public Resource Code – PRC Division 5. Parks and Monuments Chapter 1.4 California Wild and Scenic Rivers Act [5093.50 – 5093.71]

⁷ National Wild and Scenic Rivers System n.d., Interagency Coordinating Council, accessed 11 February 2022, <https://www.rivers.gov/council.php>

B. Funding Opportunities to Remove Aging or Obsolete Barriers from CA Waterways

The recent passage of the Infrastructure Investment and Jobs Act (IIJA) provides a wide range of opportunities to carry out California 30x30 strategies to remove aging and obsolete barriers from our state's waterways. This act incorporates provisions from the bipartisan Twenty-First Century Dams Act (H.R. 4375 and its Senate companion bills, S.2356 and S.2306) and provides \$2.3 billion towards advancing dam safety, retrofitting hydropower, and dam removal. Specifically, here in California, the act sets aside \$162 million for restoration of the Klamath Basin. On the other end of the spectrum, there are also provisions to fund small projects that remove instream barriers. In line with 30x30 strategies to accelerate restoration by improving processes, we encourage that a final Pathways to 30x30 document outline specific programs that will help match IIJA funding, agencies, and assistance to qualified watershed restoration projects across the state.

VII. Coastal waters and estuaries

We recommend that the Final Report take a proactive approach to enhancing beach access by addressing barriers created by communities and property owners that may take steps to discourage or block coastal access. Below are specific recommendations for enhancing coastal and ocean access as part of 30x30 efforts:

- Planning and funding for coastal and ocean conservation should include public access as a condition;
- Appropriate signs and law enforcement must protect the right to reach the beach;
- Water quality monitoring and communication programs should be implemented;
- Swim lessons and water safety training should be provided for disadvantaged communities;
- Public education campaigns should inform the public that the beach belongs to all the people;
- Regional access guides with public transportation routes should be published and distributed; and
- The state should support programs that bring diverse and underserved populations to the coast and ocean.

The state's beaches and coastal areas are popular, natural places for public-access recreation that are in critical danger of disappearing due to sea level rise. By 2030, the California coast could see a half a foot of sea level rise, according to the California Legislature's Legislative Analyst's office. The United States Geological Survey estimates that two thirds of Southern California beaches will be entirely lost by the end of the century without changes to management.⁸

The Draft Report needs to take a more proactive approach to addressing the vulnerability of beaches and other coastal ecosystems. We recommend amending the section entitled "Conservation Priorities to Mitigate and Adapt to Climate Change"⁹ to include a goal to "Conserve land and coastal waters that

⁸ <https://lao.ca.gov/Publications/Report/4261>

⁹ Draft Report, p. 17

provide nature-based solutions, *such as living shorelines*, and create climate resilient communities and ecosystems.” It is critical to acknowledge the value of this buffer zone provided by healthy beaches and adaptation projects such as living shorelines.

The priority action to “Evaluate Conservation Outcomes and Adaptively Manage” should also specifically reference the impending threat of sea level rise vulnerabilities by including a goal to support and invest in local sea level rise adaptation efforts. Such investment could include financial and capacity-building support for the Local Coastal Program Update process — the formal avenue for cities to study and address their sea level rise vulnerabilities.

An additional goal should be created that is similar to Goal 14.7,¹⁰ which outlines support for the Ocean Protection Council (OPC) reports related to MPA network opportunities for building climate resilience. We recommend adding another intention to reaffirm the importance of CNRA’s “Making California’s Coast Resilient to Sea Level Rise” Principles for Aligned Action, which was co-developed by 17 state agencies.

VIII. Oceans

The Draft Report needs to take a scientific approach to evaluating marine conservation. The Draft Report broadly defines California’s Marine Protected Area (MPA) network as meeting the definition of ‘conserved,’ apparently assuming that all MPAs meet some common baseline for biodiversity protections. This offers no opportunity to prioritize various levels of protection and contradicts the Marine Life Protection Act’s approach to MPA designation, where MPAs are defined by their levels of protection. Additionally, this approach does not establish even a basic biodiversity, access, and climate resilience baseline that is needed to consider an area ‘conserved.’ Without such a baseline, it will be difficult to evaluate conservation outcomes.

We strongly recommend using a science-based framework for evaluating and implementing marine conservation criteria, and we suggest emphasizing the consistent need for basic biodiversity, access, and climate resilience objectives to be met in any area that is considered conserved.

We also urge CNRA to work with the broader ocean community to advance marine conservation efforts. Beachgoers, sailors, swimmers, surfers, paddlers, whale watchers, divers, hikers, scuba divers and tidepoolers all have an important role in the ocean community and help make the ocean and tourism industries in California worth more than \$26 billion¹¹ — this diverse, non-consumptive group should be involved in stakeholder outreach throughout the state.

Finally, National Marine Sanctuaries (NMS) do not provide the only management opportunities to enhance conservation in existing coastal waters. NMS are not equitably distributed geographically, nor

¹⁰ Draft Report, p. 60

¹¹ [National Ocean Economics Program](#)

do they present the only opportunities to enhance biodiversity. With 840 miles of shoreline in the state and more than 2,500 square miles of ocean space under California’s jurisdiction, there are many opportunities outside of NMS and MPA borders that could benefit from conservation strategies aimed at protecting and restoring biodiversity.

IX. State of California Engagement in Federal Land Management Planning (USFS, BLM)

The federal government manages and stewards more than 47% of California’s total land and freshwater systems. As the Draft Report notes, 84.6% of California’s conserved lands are managed by federal agencies. The designation and management of this extensive federal landscape—through a variety of ongoing land management planning processes, as well as currently proposed Congressional legislative protections— represents the single greatest opportunity to improve protections, connectivity of habitat, and equitable access to nature within the state of California.

Certainly, as noted in the examples of GAP Status 1 from the Protected Areas Database, National Parks and Congressionally-designated Wilderness areas make important contributions to protecting biodiversity.¹² But beyond these existing protected areas, there remains a wide range of opportunities for the state to support further protections through a range of designation types, as well as to support ongoing and proposed landscape-scale restoration projects to help to reverse biodiversity losses and build climate resilience.

We appreciate that the strategic actions described in the Draft Report include the suggestion to “[p]artner with Federal agencies to explore where enhanced environmental conservation is beneficial and appropriate, and constructively engage in Federal land management planning to sight [sic] and implement appropriate improvements,” as well as to “[w]ork with land management agencies to change designations on public lands where appropriate to enhance conservation in targeted areas.”¹³ We also appreciate and support the various suggestions for the state to “[l]everage federal partnerships to advance conservation,” including through shared stewardship initiatives, a state-federal interagency working group, and strategic joint investments in management, stewardship, monitoring, and enforcement.

State engagement opportunities range from large-scale programmatic planning such as once-in-a-generation Forest Plan Revisions on the Sierra and Sequoia National Forests, or the drafting and implementation of long-range management plans for BLM-managed Recreation Areas and Special Recreation Management Areas like the Alabama Hills or Smith River; to the implementation of new winter travel management plans on five northern California forest units; to new winter travel management planning on the Inyo National Forest and in the Lake Tahoe Basin; to site-specific projects such as proposed landscape-scale fuels-reduction projects on the Inyo, Eldorado, and Stanislaus National Forests, or on the West Shore of Lake Tahoe; to a broad range of forest and riparian restoration

¹² Draft Report, p. 28

¹³ Draft Report, p. 42

projects, multi-agency wildlife crossing proposals, and renewable energy development proposals, to point to just a few.

Unfortunately, federal land managers and decision-makers are not always able to see cumulative impacts to biodiversity and climate resilience. They are not always aware of or incentivized to consider the range of goals and strategies for long-term, durable conservation that the state has begun to outline in this Draft Report. This is why, through direct engagement,, the state and its various agencies and representatives can have significant influence on federal land management planning, durable protective designations, and implementation. Outdoor Alliance California and our many partners and grassroots groups across California look forward to helping the state track the many opportunities available for this kind of engagement with federal land designation and management—currently and in the immediate future—and to helping develop and implement the kinds of shared stewardship initiatives and state-federal partnerships suggested above. By way of example, in order to effectively advance the state’s 30x30 goals and to enhance durable protections on the federal landscape, some of the specific strategies for state engagement should include support for the following priorities:

- Roadless Areas and Backcountry Management Areas
- Near Natural Areas
- Special Interest Areas for sensitive species and other vulnerable resources
- National Scenic Trails
- National Scenic Areas
- Special Recreation Management Areas
- Wild & Scenic Rivers
- Semi-primitive non-motorized recreation areas (established through forest service travel management planning)
- Multi-agency wildlife corridor designations and crossing infrastructure
- Landscape-scale fuels reduction and forest restoration projects
- Sustainable trails networks
- Recommended Wilderness Areas where appropriate

X. State of California support for proposed Federal Legislation to advance California’s 30x30 goals

The 117th Congress is currently considering several pieces of legislation that would provide durable protections in line with California’s 30x30 goals, particularly *Strategy 3: Enhance Conservation of Existing Public Lands and Coastal Waters*. Outdoor Alliance California strongly supports four current bills that would protect hundreds of thousands of acres of federal public lands throughout the state as Wilderness, Wild & Scenic Rivers, or other designations like National Recreation Areas.

Importantly, these bills were crafted with input from the outdoor recreation community so that they preserve and enhance human-powered outdoor recreation resources like climbing areas, mountain bike trails, and river access points. These bills—and the human-powered recreation resources that they protect—are briefly described below.

Northwest California Wilderness, Recreation, and Working Forests Act (H.R. 878; also included in S.

1459, the PUBLIC Lands Act, and H.R. 803, the Protecting America's Wilderness and Public Lands Act). This bill would conserve approximately 262,000 acres of public land as Wilderness, designate 379 miles of new Wild and Scenic rivers, and create a special restoration area of more than 700,000 acres. In addition to protecting conservation values in the area, the bill would expand opportunities for sustainable recreation. With the establishment of the Elk Camp Ridge Recreation Trail, the bill would benefit northwest California by expanding mountain biking trails along the Elk Camp Ridge and in Del Norte County. It would permanently protect the South Fork Trinity River—a popular and valuable steelhead fishery—and study the feasibility of establishing the Bigfoot National Recreation Trail to highlight the botanical and biological diversity of the region. We greatly appreciate the bill's attention to ensuring the protection and sound management of Wilderness climbing opportunities, as well as the inclusion of Land of the Lost—the closest sport climbing to Arcata and Eureka—in a special management area. Moreover, 25 whitewater river access points will be protected within proposed Wilderness and special restoration areas, and potential Wilderness areas will ensure boaters can continue to paddle along the banks of the lower portion of Redwood Creek surrounded by the tallest living trees in the world.

Central Coast Heritage Protection Act (H.R. 973; also included in S. 1459, the PUBLIC Lands Act, and H.R. 803, the Protecting America's Wilderness and Public Lands Act). The bill would protect more than 262,000 acres of public land within the Los Padres Forest and Carrizo Plain National Monument, designate 159 miles of river as Wild and Scenic, and create two new scenic areas, Black Mountain and Condor Ridge. In addition to safeguarding clean air and water for Californians, the bill would create and expand opportunities for outdoor recreation. It designates a 400-mile-long Condor National Recreation Trail, supporting through-hiking and backpacking opportunities across the entire length of the Los Padres National Forest, from Los Angeles to Monterey County. It would also protect important and threatened wilderness characteristics around popular rock climbing areas in the Sespe Gorge along Highway 33. Paddlers support adding more miles to the Wild and Scenic Piru Creek, a waterway rare for the region that provides outstanding whitewater less than an hour drive from downtown Los Angeles. Importantly, all proposed new Wilderness boundaries were drawn in order to preserve existing mountain biking trails, and the bill would mandate that the Forest Service conduct future studies for improving mountain biking trail opportunities across the Los Padres National Forest.

San Gabriel Mountains Foothills and Rivers Protection Act (H.R. 693; also included in S. 1459, the PUBLIC Lands Act, and H.R. 803, the Protecting America's Wilderness and Public Lands Act). The bill would expand the San Gabriel Mountains National Monument by nearly 110,000 acres to include the western portions of the Angeles National Forest. The bill would establish an 8,417 acre Condor Peak Wilderness and a 6,774 acre Yerba Buena Wilderness. Additionally, the San Gabriel Wilderness would be expanded by 2,000 acres, and the Sheep Mountain Wilderness by nearly 14,000 acres. The proposed Sheep Mountain Wilderness additions include a segment of the famous Pacific Crest Trail and the popular East Fork Trail. We especially appreciate the various designations included in the bill that allow for multiple recreational uses. The San Gabriel foothills are an important urban/wild buffer zone and the gateway to the mountains for many millions of Angelenos who otherwise have

limited access to open space and outdoor recreation. The establishment of a 51,000-acre National Recreation Area along the foothills and San Gabriel River corridor and Puente Hills will not only help improve that access, but will also ensure that these highly popular and heavily used areas receive the resources they need to be managed and maintained in a sustainable manner for the safety and enjoyment of all.

Rim of the Valley Corridor Preservation Act (H.R. 1075; also included in H.R. 803, the Protecting America’s Wilderness and Public Lands Act). The Rim of the Valley Corridor Preservation Act will expand the Santa Monica Mountains National Recreation Area by 191,000 acres and facilitate more equitable access to outdoor recreation opportunities. The bill will support recreation and conservation planning as well as needed capital improvements on public lands surrounding the San Fernando Valley and the greater Los Angeles area.

These bills are all included in H.R. 803, the Protecting America’s Wilderness and Public Lands Act (PAW+), which passed the House of Representatives in 2021. The State of California should strongly consider supporting these four bills in order to advance its 30x30 strategy.

* * *

On behalf of the human-powered outdoor recreation community, thank you for your work in developing the *Draft Pathways to 30x30 Strategy* and *Regional Opportunities* report. We look forward to continuing to work with you to advance conservation and sustainable and equitable recreation access in California.

Sincerely,

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Appendix A:

By way of illustration, we have included below a number of recommended outdoor recreation, conservation and restoration projects that would specifically and significantly contribute to California's 30x30 objectives. Outdoor Alliance California believes that protecting public lands and waters through the 30x30 initiative can benefit both nature and people. This is an opportunity to look holistically at conservation of habitat, outdoor recreation, equitable access to the outdoors, and climate resiliency to achieve sustainable results that will benefit communities immediately as well as future generations.

Northern Sierra Nevada

[Connected Communities](#)

The Connected Communities Project is a visionary effort in partnership with the US Forest Service, Sierra Buttes Trail Stewardship, and other community partners to connect 15 mountain towns in Northern California for economic prosperity through outdoor recreation and conservation. The trail network will create a vision for a recreation-focused lifestyle through community investment, shared stewardship, economic opportunity, and important new local jobs, all benefiting economically disadvantaged communities in California's Plumas, Sierra, Butte, and Lassen Counties.

Eastern Sierra

[Eastern Sierra Wildlife Crossing Project](#)

Within Caltrans District 9, the highest frequency of Wildlife Vehicle Collisions (WVC) are documented on Highway 395 and Highway 203 in Mono County between the Community of Crowley Lake and the Town of Mammoth Lakes (TOML). Collisions with large mammals, mainly mule deer, come with risk of property damage and injury to drivers. Furthermore, WVCs can negatively impact deer populations, which are important to the economy, culture, and biology of the region. This multi-agency project proposes to construct a wildlife crossing corridor consisting of overcrossings, undercrossings, and an exclusion fence to reduce WVCs. There are 5 project alternatives consisting of different WVC reduction treatments along the corridor.

[The Eastern Sierra Climate & Communities Resilience Project](#)

The project involves planning for landscape-scale ecological forest restoration on over 55,000 acres surrounding the Town of Mammoth Lakes. In the face of rapidly increasing climate stressors, the need for proactive forest management action is urgent. Supported by the Sierra Nevada Conservancy and a robust stakeholder group that shares a vision to promote both community and ecological resilience.

[Buttermilk Infrastructure and Recreation Planning Initiative](#)

The popularity and expanded use of the Buttermilk Bouldering area northwest of Bishop would be addressed by creating an infrastructure and recreation plan to improve infrastructure and formalize trails and camping areas and parking.

Los Angeles

[San Gabriel Valley Greenway Network](#)

The San Gabriel Valley Greenway Network Strategic Implementation Plan will transform the storm channels, washes, and creeks that feed into the San Gabriel and Rio Hondo Rivers into a modernized network of bicycle and pedestrian pathways and linear parks. This regional network will connect communities via an active transportation system and expand much needed access to open recreation and green space for those who live, work, and play in the San Gabriel Valley.

[Puente Hills Landfill Park](#)

The Puente Hills Landfill, which operated from 1956 until it closed in 2013, was formerly the nation's second largest landfill. The 1,365-acre site is uniquely situated at the northern terminus of the 31-mile long Puente-Chino Hills corridor. Over time, 142 acres of the site will be reclaimed as public parkland for the residents of Los Angeles County and beyond.

San Diego Region

[Tijuana River Valley Estuary Cleanup](#)

The health and well-being of coastal communities on both sides of the U.S.-Mexico border and the millions of people who enjoy this stretch of coastline have long been under threat from the flow of untreated sewage, industrial pollution and trash into the Tijuana River Watershed and the Pacific Ocean. With funding from a NOAA Marine Debris Program Community-based Marine Debris Removal Grant, the Southwest Wetlands Interpretive Association (SWIA) is working with staff from the Tijuana River National Estuarine Research Reserve (TRNERR) and California State Parks to address these issues.