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MEMORANDUM

January 13, 2022

TO: Board of Supervisors
Agenda Date: January 18, 2022

FROM: Richard Egan, County Administrative Officer 

SUBJECT: Comment letter regarding State of California's "30 x 30" strategy

RECOMMENDATION: **That the Board:** Approve letter.

PRIOR BOARD ACTIONS: None.

DISCUSSION: A comment letter is attached for your consideration. This letter is responsive to RCRC's announcement:

"According to RCRC" In California's latest effort to advance the state's "30x30" strategy, the California Natural Resources Agency (CNRA) released its Draft "Pathways to 30x30: Accelerating Conservation of California's Nature" for public comment on December 15, 2021. The Draft is part of the agency's response to Governor Gavin Newsom's Executive Order N-82-20 which calls for the conservation of 30 percent of the state's lands and coastal waters by the year 2030.

The Draft includes approaches to ecological restoration and adaptive management through a variety of strategies, including utilizing intergovernmental partnerships. CNRA is accepting comments on the Draft through January 28, 2022, and the Draft and all supporting documents can be found on the CNRA website [<https://www.californianature.ca.gov/pages/30x30>]. CNRA has also established a 30x30 Advisory Committee to provide input on implementation strategies. Committee membership includes Mono County Supervisor and RCRC Chair Stacy Corless. A virtual meeting of the Committee will occur on January 12, 2022 and is open to the public"

The State has grouped Lassen County into the Sierra Nevada Region; this chapter is attached for your information.

FISCAL IMPACT: None.

OTHER AGENCY INVOLVEMENT: Rural Counties Representatives of California (RCRC); David Lyle, UC Cooperative Extension Director and Farm Advisor.

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County of Lassen
BOARD OF SUPERVISORS



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January 18, 2022

Wade Crowfoot, Secretary
California Natural Resources Agency
715 P Street
Sacramento, CA 95814

RE: Comment Letter, Draft "Pathways to 30x30" strategy

Dear Mr. Crowfoot:

On behalf of the Lassen County Board of Supervisors, I am pleased to provide our comments on the California Natural Resources Agency (CNRA) Draft "Pathways to 30 x 30: Accelerating Conservation of California's Nature."

30 x 30 divides California into nine regions and puts Lassen County in the Sierra Nevada Region. While a portion of the Sierra Nevada mountain range does exist in Lassen County, other equally important landscapes in Lassen County include the Cascade Range, Modoc Plateau, and Basin and Range geomorphic provinces. All of these equally important landscapes converge nearby the county seat of the City of Susanville. Lassen County covers 4,720 square miles, the 8th largest county by size, and 47th least populated county in the state. Lassen County is also the location of Eagle Lake, the second largest natural fresh water lake wholly in California. There are nine state-managed wildlife areas and 1.6 million acres of public land is managed by the federal government. Overall, approximately 59% of the land in Lassen County is owned or controlled by a federal, state or local government agency.

Please accept and give your full consideration to our comments, as follows:

Conservation Challenges:

- **Intergovernmental Partnerships:** The Draft seeks to utilize intergovernmental partnerships. A good starting point for improving intergovernmental partnerships would be for the State to honor its past promises made to counties. With regard to land conservation, the state currently owes millions of dollars to Lassen County from the California's Payment-in-Lieu-of Taxes (PILT) program of 1949 and California Land Conservation Act of 1965 (Williamson Act). These are payments made by the State for mitigating the adverse impacts to county property tax revenues that result when the state acquires private property for wildlife management areas or when private property enrolls in the Williamson Act program. The state's broken promises have impacted this county's ability to deliver basic public services, especially public safety.

- **State priorities:** The state is not currently maintaining land and facilities under its ownership. While it is predicted in the Governor's 2022-2023 proposed budget that the state will have a \$45.7 billion surplus, the state has \$66.9 billion in deferred maintenance for state-owned facilities. In the state's California Five-Year Infrastructure Plan 2021-22, the state has identified \$66.9 billion in deferred maintenance but the then 2021-22 Governor's Budget had only proposed \$250 million for deferred maintenance projects. Needed, but not funded, deferred maintenance requests include \$1.2 billion for state parks, \$157 million for the Department of Forestry and Fire Protection, and \$71 million for the Department of Fish and Wildlife. According to the state's infrastructure plan, that "deferred maintenance is maintenance that has not been completed to keep state-owned facilities in an acceptable and operable condition and that is intended to maintain or extend their useful life." The 30 x 30 strategy should solve this problem and emphasize clearing the backlog of deferred maintenance, on behalf of Californians, prior to the state making any new acquisitions of land.
- **Trespassing and environmental crimes on public lands:** Overcoming illegal cannabis cultivation's impacts, and other crimes on our public lands, are a major conservation challenge. All of the environmental harms, enforcement problems, and threats to public safety associated with illegal cannabis cultivation are proving to be unsurmountable problems that all levels of government are dealing with and achieving little success.
- **Intensifying wildfires:** Climate change alone is not the reason for wildfires. Decades of forest mismanagement by public agencies and environmental regulations have created hazardous fuels conditions throughout our public lands. Gross mismanagement has resulted in loss of life and property, destroyed businesses and lost jobs, and ruined the resource, and our local economy, now and for future generations.
- **Wildlife Migration Corridors:** According to the UC Davis Road Ecology Center; Seventh Annual Special Report on the Impact of Wildlife-Vehicle Conflict (WVC) on California Drivers and Animals, "Wildlife-vehicle collisions continue to be an under-recognized and under-reported threat to wildlife population and to drivers in certain areas." Lassen County would support actions by the state to allocate sufficient funding to build needed WVC reduction projects along the U.S. Hwy 395 corridor.
- **Groundwater exportation to the State of Nevada:** The potential and threat of water exportation from Lassen County ground water basins was demonstrated in the late 1980's and 1990's with private interests in the State of Nevada to develop projects in Washoe County, Nevada. The state has adopted groundwater restrictions to deal with exportation including the Sierra Valley Groundwater Basin Act, Honey Lake Valley Ground Water Basin Act, and Surprise Valley Groundwater Basin Act, in response to the intentions of the private interests in Nevada to pump groundwater from California.
- **State "managed" Wildlife Areas:** Lassen County is home to several state "managed" wildlife areas. As discussed above, the state has billions of dollars of deferred maintenance. 30 x 30 should address deferred maintenance, and improve the critical habitat within, state "managed" areas. Wildlife areas in Lassen County include Willow Creek, Honey Lake, Hallelujah Junction, Biscar, Ash Creek, Doyle, Surprise Valley, Bass Hill, and Silver Creek. These are areas that contain critical habitat that require greater budgetary priority by the state, especially to address issues such as invasive species,

deferred maintenance, habitat restoration, and accessibility improvements for visitors.

Important Habitats for Conservation:

- Important habitats for conservation must be those that contain critical habitat, that if acquired, will expand and increase public opportunities for hunting and fishing by the general public. Support for and expansion of hunting and fishing opportunities is well known to be a great motivation for the acquisition and conservation of land. It is very important to us that the state continue to work in partnership with wildlife and fisheries habitat conservation groups to ensure that existing lands and new acquisitions do not prohibit or exclude opportunities for hunting, fishing, and gathering.

Access Priorities:

- As stated above, the state has tens of billions of dollars of deferred maintenance. Removal of barriers to access to state-owned lands, pursuant to the Americans with Disability Act, should be a priority of the state to complete prior to the state acquiring additional properties and conservation easements.
- Multiple Use. Management of state-owned lands should provide assurance of maximum public benefit. The state should plan for multiple use and manage renewable and non-renewable resources to maximize public benefit. Access plans should accommodate all uses and users, including powered mobility-aids, all-terrain vehicles (ATV), horseback riding, foot traffic, swimming, skiing and over-snow-vehicles, target shooting, hunting, fishing, off-highway vehicles, mountain biking, camping, and other user groups.

Barriers to Access:

- According to the California Protected Areas Database, there are over 50 million acres of protected open space lands in California in addition to 49.6 million acres in 15,989 "parks". The state should aggressively focus on removing barriers to access to those lands prior to implementing 30 x 30.

Projected Climate Change Impacts:

- Projected Climate Change Impacts cannot be mitigated. Lack of funding and unfunded state mandates are the most significant threats and barriers facing Lassen County's ability to provide public services. Lack of funding and unfunded state mandates reduces the county's ability to plan, prepare for and respond to impacts facing Californians and visitors to the state, such as impacts caused from extreme temperatures, fires, drought or flooding, grid failures, and inclement weather.

Potential Nature-Based Solutions:

- Mismanagement of public forestlands is a disaster being made worse from antiquated environmental laws and regulations that slow or prevent good science based sustainable habitat work, and other resource and forest management efforts. A potential nature-based solution would be to seek to eliminate environmental "green tape" that causes delay in controlling invasive species and delay the harvesting/planting/reforestation of wildfire destroyed forestlands, grasslands, and other critical habitats.
- Agricultural based solutions, such as Williamson Act, should be given urgency and priority over land acquisitions. Agriculture is one of California's key industries. Continued use and conservation of grazing and farmland are opportunities that also provide wildlife habitat and

water quality benefits. Using the Williamson Act would decrease the state's need to acquire and manage land, however, would add to the amount of conserved land throughout the state. The state should incentivize, through the removal of financial, policy and regulatory barriers, investments in farming and grazing practices that help to achieve the state's conservation objectives. Studies from the University California, Davis, have found that grasslands and rangelands can be more resilient carbon sinks than forests, and that proper grazing management can even help mitigate climate change.

- Restoring and maintaining fire resilient landscapes by doing hazardous fuel treatments such as chipping, thinning, burning and grazing are nature-based solutions. Fuel hazard mitigation efforts have treated over 90,000 acres in Lassen County and an additional 30,000 acres are scheduled for treatment by the Lassen Fire Safe Council, Inc. The state should continue to do more to make incentives and enact regulatory-relief measures that simplify and accelerate state and federal approvals to restore and create resilient landscapes.
- Excessive feral horse and feral burro grazing, invasive annual grasses, expansion of native western juniper, and altered frequencies of fire are cited examples by the California Wildlife; Conservation Challenges (CA State Wildlife Action Plan 2005) as major stressors negatively affecting resources. These are serious problems causing negative impacts on resource lands. Dealing with these issues, should, more than anything else, be given urgency and priority by the state as essential nature-based solutions that can provide immediate conservation benefits without the need to acquire additional land.
- Groundwater Sustainability Agencies. The state's Sustainable Groundwater Management Act (SGMA) is establishing managing groundwater at the local level. Priorities that may be implemented in groundwater sustainability plans (GSPs) could include water conservation efforts that also could be advantageous to wildlife habitat and ecosystems dependent on groundwater and interconnected surface water.

Conservation Challenges:

- We completely disagree with the state's assertion of competing priorities between grazing, agriculture, and conservation. This is simply not a true statement. Livestock grazing is being used with success for improving and maintaining habitat for important species, and grazing also helps to keep potential wildfire fuels in check and helps to control non-native plants. We respectfully request that you correctly give importance to the use of grazing and agricultural practices as a successful and relevant management tool for achieving conservation objectives. Science and peer-reviewed studies on such successes are available from the University of California, Agriculture and Natural Resources publications. The state should investigate why many grazing permit allotments are not being utilized on federal lands to determine solutions that can expand grazing as a management tool.
- The state's practice of deferring maintenance of existing state-owned lands, and not partnering with local agencies to improve upon other public lands, means potentially higher costs to Californians, health and safety failures, barriers to access, and other negative implications. The state must redirect and focus its conservation priorities to deal with deferred maintenance and the restoration of existing landscapes, statewide and locally.

Conservation Successes:

- There are many notable conservation success examples. Here are a few recent publications

spanning grazing systems and conservation benefits:

- Rangeland Ecosystem Service Markets: Panacea or Wicked Problem? Roche LM, Saitone TL and Tate KW (2021)
- Soil Health as a Transformational Change Agent for US Grazing Lands Management, J.D. Derner et al / Rangeland Ecology & Management 71 (2018)
- Riparian Meadow Response to Modern Conservation Grazing Management, Kristin M. Oles, et al / Environmental Management (2017)

And, specifically to Lassen County:

- Buffalo Skedaddle Sage-grouse Working Group. A multi-stakeholder group that is still active, and on-going, a collaborative for promoting improvement of sagebrush and sage grouse habitat in eastern Lassen County (extending into Washoe County, Nevada).
- Pine Creek Coordinated Resources Management Planning group (CRMP). A locally driven collaborative to maintain Eagle Lake water quality and Eagle Lake rainbow trout conservation, while maintaining grazing, forest management, and recreation within the Eagle Lake basin.
- Locally, there are numerous conservation projects at a smaller scale that are too numerous to list herein.
- Resource Conservation Districts (RCDs) are promoted as the “Go-to hubs for conservation.” RCDs in Lassen County include the Fall River RCD, Honey Lake Valley RCD, Pit RCD, Sierra Valley RCD, and Feather River RCD. The state’s 30 x 30 strategy must recognize, build upon and prioritize support of RCDs for their decades of successful partnerships and conservation successes, statewide.

Thank you for your consideration of our comments.

Sincerely,

Chris Gallagher, Chairman
Lassen County Board of Supervisors

CC: Assemblymember Megan Dahle
Senator Brian Dahle
“30 x 30 Sierra Nevada Region”:

Alpine County Board of Supervisors
Amador County Board of Supervisors
Calaveras County Board of Supervisors
El Dorado County Board of Supervisors
Fresno County Board of Supervisors
Inyo County Board of Supervisors
Kern County Board of Supervisors
Madera County Board of Supervisors
Mariposa County Board of Supervisors
Modoc County Board of Supervisors
Mono County Board of Supervisors
Nevada County Board of Supervisors
Placer County Board of Supervisors
Plumas County Board of Supervisors
Tulare County Board of Supervisors
Tuolumne County Board of Supervisors
Rural County Representatives of California (RCRC)
California State Association of Counties (CSAC)

PATHWAYS TO
30x30
CALIFORNIA

Appendix A

REGIONAL OPPORTUNITIES

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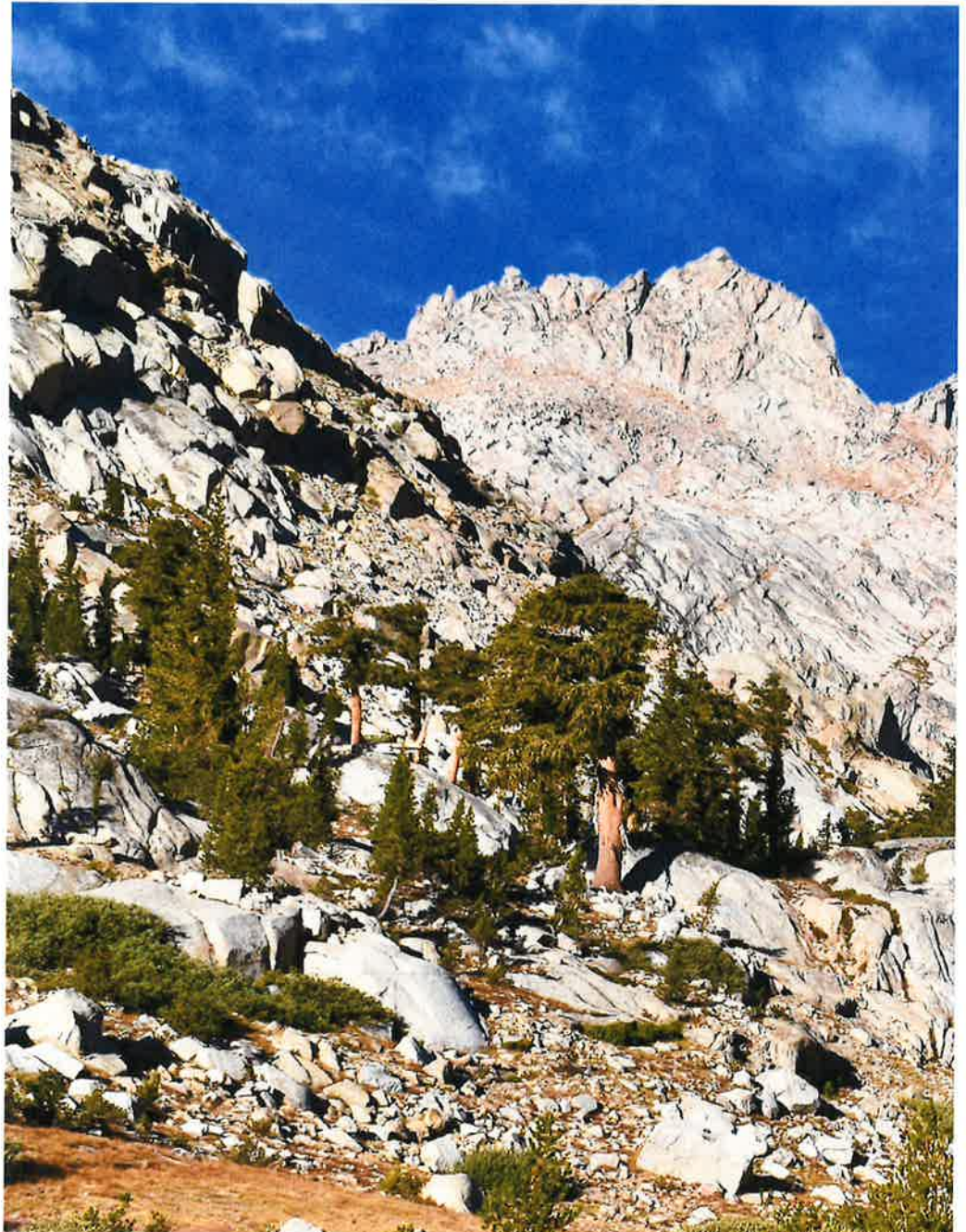
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Introduction

Workshops were held for each region and an online public input questionnaire was utilized to solicit ideas and insights to support this document. CNRA asked questions designed to gain a better understanding of regional priorities, challenges, and opportunities for increasing conservation of lands and coastal waters in each region. The public was invited to provide input on local priorities and concerns related to protecting biodiversity, combating climate change, and providing equitable access to nature. CNRA also asked the public to help define conservation for 30x30 and describe metrics for success. The intent of the public engagement process was to initiate a dialogue with local communities, whose partnership will be essential in achieving 30x30. During the public engagement process, multiple ad-hoc regional working groups gathered to discuss 30x30 and provide written comments on priorities and needs. To learn more about the public engagement process, please refer to Appendix C. The sections below include insights obtained from public engagement for each of the state's nine identified regions.

CA Nature Regions





Sierra Nevada Region

The Sierra Nevada Region represents 18 counties situated in the east of northern and central California. It includes the entirety of Alpine, Amador, Calaveras, El Dorado, Inyo, Lassen, Mariposa, Modoc, Mono, Nevada, Plumas, Sierra, and Tuolumne Counties as well as the eastern extents of Fresno, Kern, Madera, Placer, and Tulare Counties. The Sierra Nevada region is famous for its picturesque mountains and deep desert basins.

Cover Photo Credit: William Oestreich

Photo: Meadow in Sequoia National Park



Sierra Nevada Region

45000 square miles

Approximately 750,000 people

Conservation Challenges

- › Exportation of water from the region
- › Competing priorities between grazing, agriculture, and conservation
- › Intensifying wildfires throughout the region due to climate change

Conservation Successes

- › Yosemite and Sequoia/Kings Canyon National Park
- › Programs such as the Sierra Foothills Conservancy and the Sierra Nevada Conservancy
- › California Conservation Corps



Photo credit: Madeline Drake

Photo: Bristlecone Pine, Inyo National Forest

Regional Landcover Percentages

Agriculture	1.72%
Barren/Other	5.56%
Conifer	32.68%
Desert	21.94%
Hardwood	8.59%
Herbaceous	5.55%
Shrub	20.18%
Urban	0.73%
Water	2.17%
Wetland	0.88%

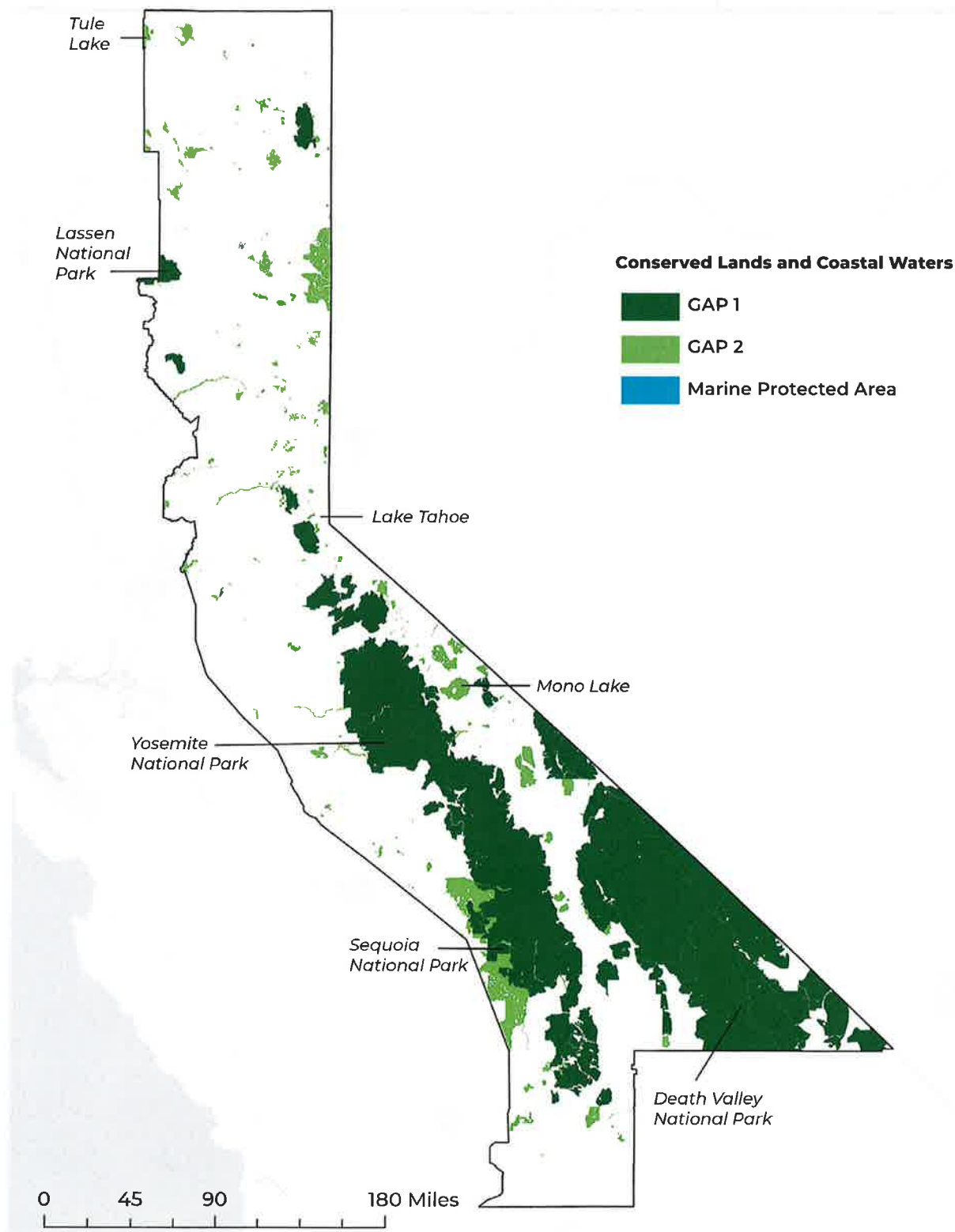
Land Management

- › Private: 26.7%
- › Federal Government: 70.3%
- › State Government: 1.3%
- › Local Government: 1.5%
- › Non-profit: 0.2%

Sierra Nevada Region

45000 square miles

Approximately 750,000 people



Sierra Nevada Region

45000 square miles

Approximately 750,000 people

Important Habitats for Conservation

- › Alpine forests
- › Oak woodlands
- › Sequoia groves
- › Meadows

Iconic Species

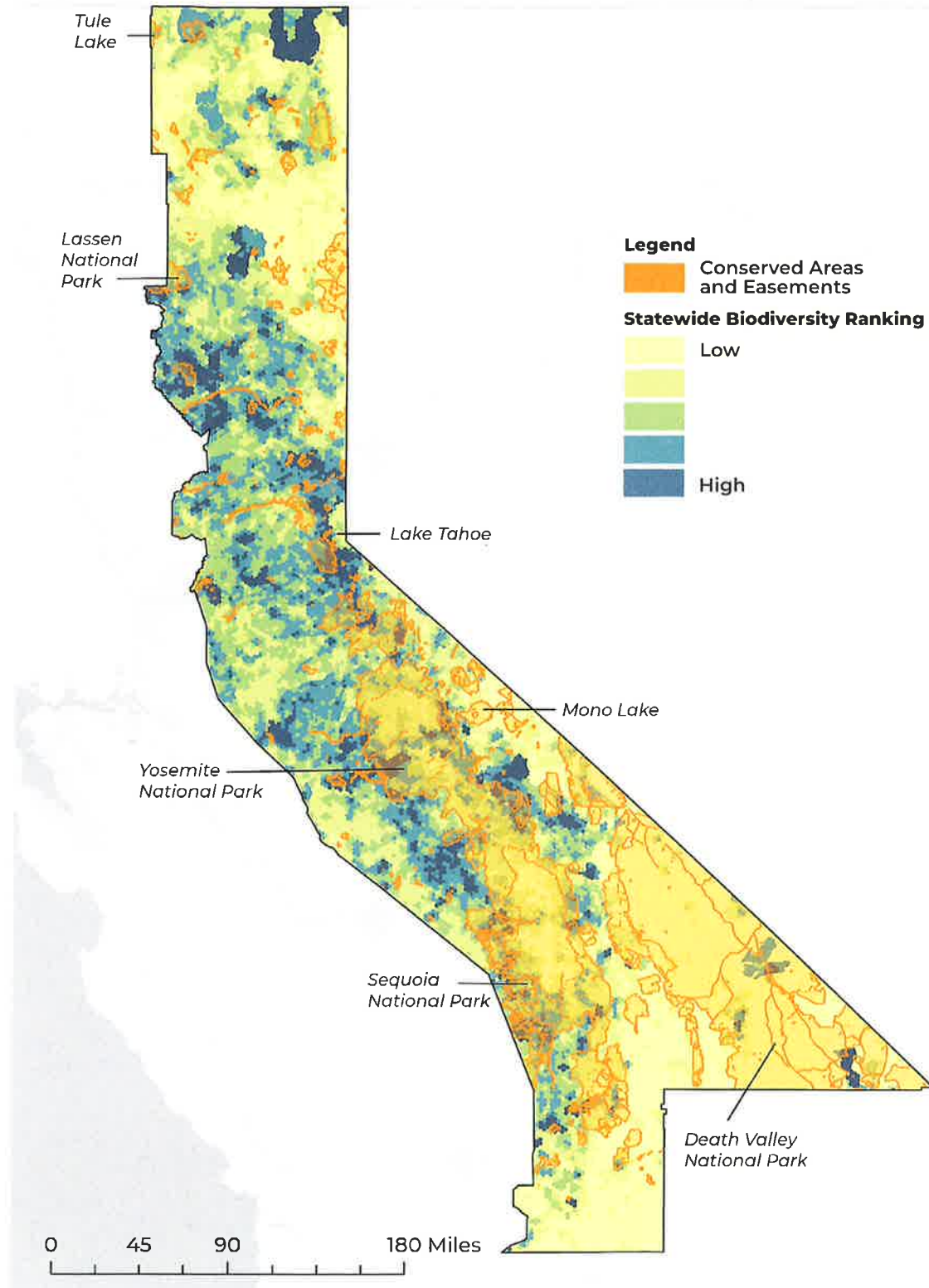
- › Pacific Fisher
- › Mountain yellow-legged frog
- › Giant Sequoia
- › Sage Grouse

Photo credit: Rick Kuyper, USFWS
Photo: Mountain yellow-legged frog

Sierra Nevada Region

45000 square miles

Approximately 750,000 people



Sierra Nevada Region

45000 square miles

Approximately 750,000 people

Access Priorities

- › Public transportation to ensure that people from underserved areas can visit National Parks and other protected areas
- › Education, and in particular collaboration with NGOs and education programs targeting youth in the Sierra Nevada region

Barriers to Access

- › Funding to offset national park fees and transportation costs
- › Increasing the proximity to parks for low-income communities

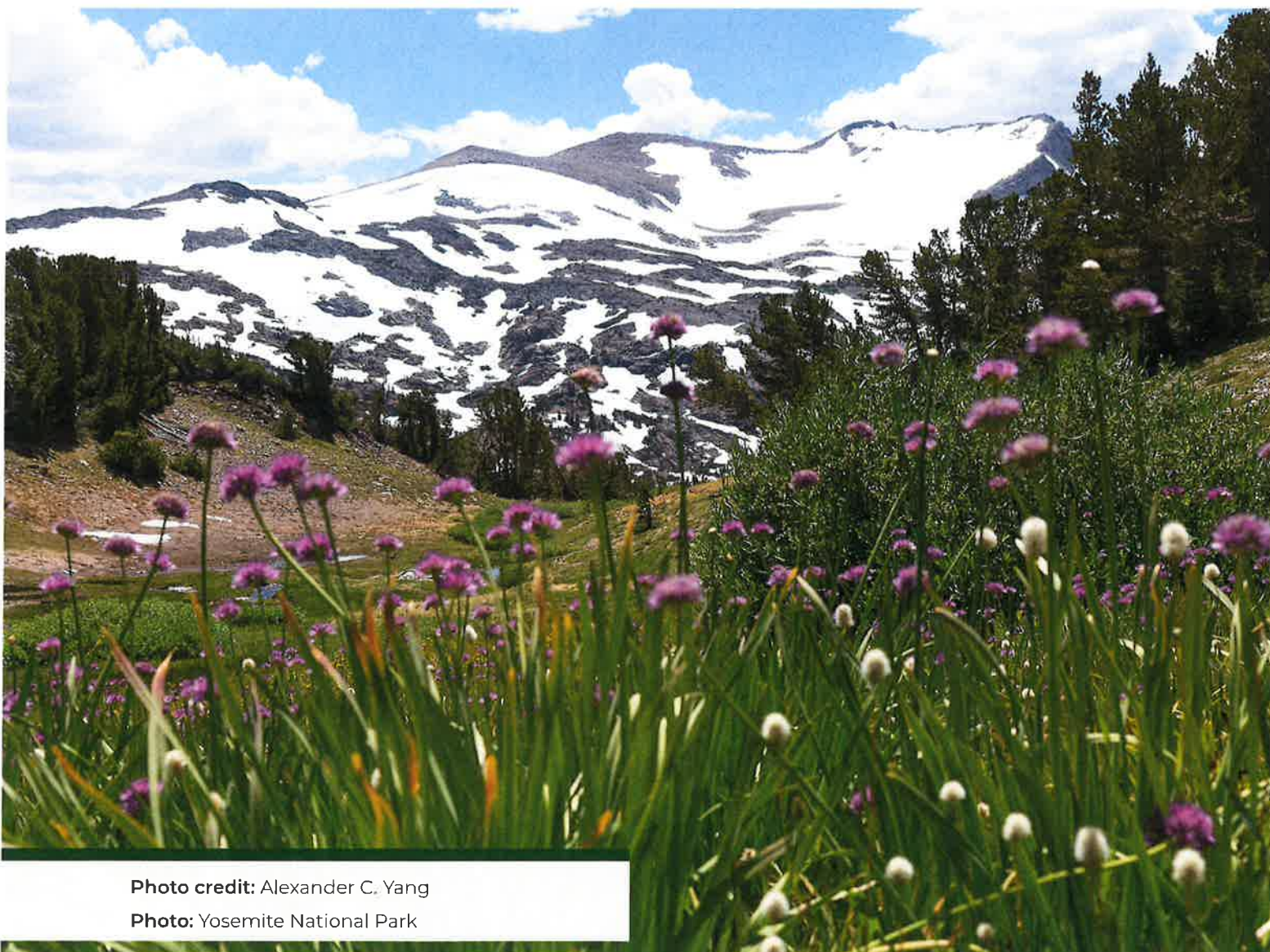


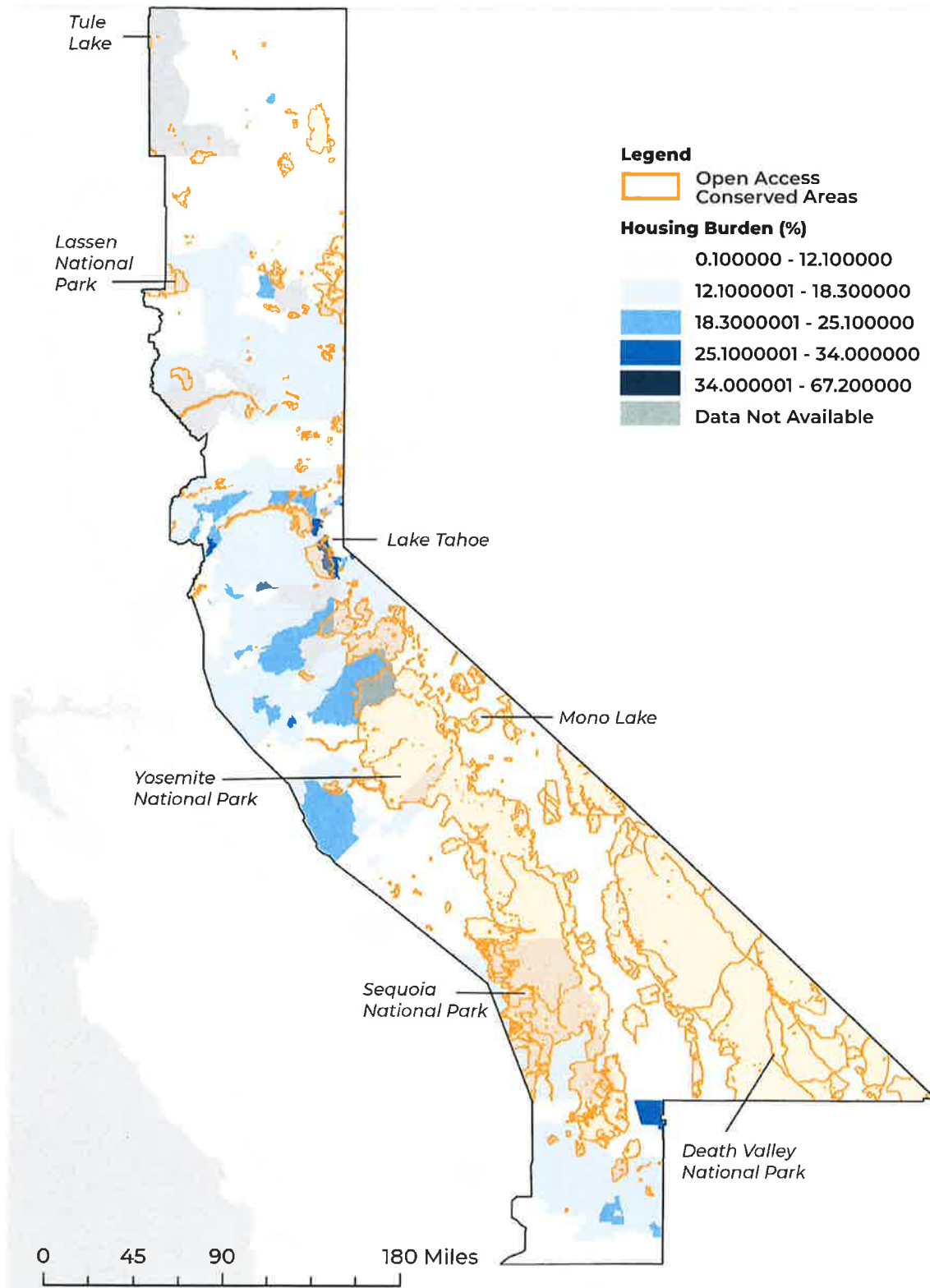
Photo credit: Alexander C. Yang

Photo: Yosemite National Park

Sierra Nevada Region

45000 square miles

Approximately 750,000 people



Sierra Nevada Region

45000 square miles

Approximately 750,000 people

Projected Climate Change Impacts

- › Increasing temperatures
- › Precipitation extremes of rain/snow and drought
- › Reduced snowpack
- › Intensifying wildfires throughout the region and specifically in the wildland-urban interface

Potential Nature-Based Solutions

- › Prescribed fires, cultural burning, fuel reduction and natural fire regimes
- › Forest management and conservation such as reforestation of deforested areas, composting for fire-scarred land, and sustainable forestry
- › Meadow restoration
- › Sustainable grazing and agriculture

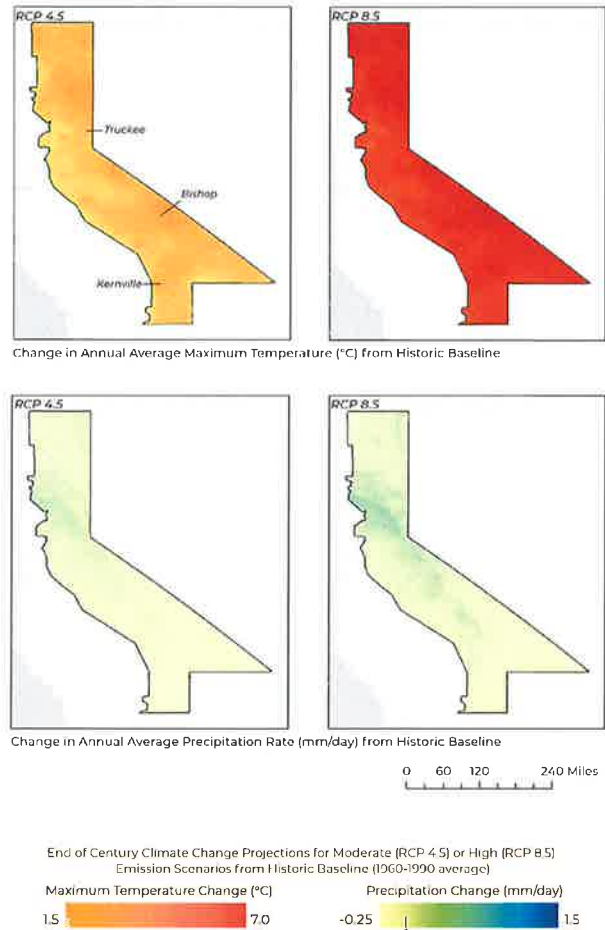


Photo credit: California State Parks

Photo: Mono Lake

30x30

CALIFORNIA



CaliforniaNature.ca.gov