



July 30, 2021

Secretary Wade Crowfoot  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Dear Secretary Crowfoot,

On behalf of Azul, I am writing to provide recommendations for California's strategy to conserve 30 percent of the state's land and coastal waters by 2030 (30x30).

Since 2011, Azul's people-centered work has built a bridge between environmental justice (EJ) and marine policy. We have achieved this through our advocacy on equitable coastal access at the California Coastal Commission, as a co-sponsor of Assemblymember Kalra's legislative proposal to establish a state 30x30 target (AB 3030), on plastic pollution with the [United Nations Environment Programme](#), and most recently through the [Ocean Justice Forum](#). Azul's work emphasizes that BIPOC and EJ communities, that often bear the brunt of environmental degradation, not only have rights, but also a critical voice in marine conservation.

When Governor Newsom signed [Executive Order N-82-20](#), he made a commitment to expand equitable outdoor access for all Californians, and actively engage and collaborate with Native American Tribes, frontline communities, and environmental justice leaders. We are proud to see the equity principles that Azul fought to include in AB 3030 from the start reflected in E.O. N-82-20, and we expect the state to deliver on this commitment.

By integrating equity and access values into the state's 30x30 strategies, California has an opportunity to redefine conservation. California's approach to reach the 30x30 goal has and will continue to set the stage for implementation across the country and the rest of the world. As a result of California's leadership, President Biden signed [Executive Order 14008](#) in January 2021 directing the Department of the Interior to develop guidelines to achieve 30x30 nationally. With this E.O., President Biden committed to "deliver environmental justice in communities all across America," and improve access to recreation. Moreover, the Department of Interior's recent report, "[Conserving and Restoring America the Beautiful](#)," explicitly references California's role in informing its development of federal 30x30 priorities.

Because of this, as California prepares to attend the [15th meeting of the United Nations Conference of the Parties to the Convention of Biological Diversity \(CBD\)](#) as [an official Observer](#) this fall, it is imperative that the 30x30 strategies put forward by the state live up to federal and global expectations for and truly embody principles of equity and access.

To successfully achieve this, we urge the state to do the following in its 30x30 Strategic Pathways Document:

1. Acknowledge that conservation of 30% of the state's land and coastal waters is the minimum level of protection needed to safeguard our natural resources for future generations, and signal that by no later than 2025, the state intends to set a more ambitious goal to [protect 50% of our land and coastal waters by 2050](#),
2. Define conserved areas in the context of 30x30 as those: (a) established with ensuring measures; (b) that support thriving biodiversity; (c) contribute to California's climate resilience; (d) provide ecosystem services; (e) are managed so that their natural character, resources, and functions are conserved, protected, restored, and enhanced for current and future generations; (f) are equitably accessible to BIPOC and environmental justice communities; (g) respect Tribal sovereignty, rights, and stewardship; and (h) align with [IUCN's equity framework for protected areas](#).
3. Require that the 30% goal for coastal waters is met with only strict no-take preserves, by adding new no-take preserves to the Marine Protected Areas (MPA) network and expanding the size of existing no-take preserves, which currently only account for 9% of the state's MPA network. This will ensure that California conserves and rebuilds stocks of commercial and non-commercial species and protects marine ecosystems.
4. Use multi-objective prioritization to add new highly protected MPAs in strategic locations off our coast with the greatest potential for [biodiversity protection](#), [increased fish yields](#), [protection of marine sediment carbon stocks](#), and increased connectivity. These win-win scenarios directly align with Gov. Newsom's biodiversity, food security, and climate goals.
5. Prioritize equitable public access for non-extractive, non-polluting, and culturally significant uses over extractive and polluting uses within existing and new state MPAs that count toward the 30% goal for coastal waters.
6. Acknowledge that over exploitation of our coast and ocean resources by a few individuals challenges the basic human right of all people to sustainably use and enjoy the health and environmental benefits provided by the coast and ocean in the 30x30 Strategic Pathways Document. When a few individuals overfish or

pollute the ocean, those few benefit at the expense of all other people's right to enjoy the benefits of our ocean.

7. Require that the stakeholder group that updates existing MPA maps and maps new MPAs reflects California's demographics.
8. Establish a 30x30 Ocean Equity Advisory Panel by January 2022, that is composed of ocean-focused Tribal and EJ leaders, community-based organizations, and academic experts similar to the Equity Advisory Panel, to develop an ocean-focused summary document similar to the "Using Nature-Based Solutions to Advance Equity Advisory Panel Summary Document."
9. Develop equity standards that all state governing bodies identified in the 30x30 Strategic Pathways Document to support 30x30 implementation must meet. These can include:
  - A requirement that all 30x30 and State MPA network related materials, including but not limited to the 30x30 Strategic Pathways Document, those produced by the MPA Collaborative, or any associated with the upcoming MPA update process, are translated and available in the top three used languages within each of the four work regions (Northern, North Central, Central, and Southern California MPAs).
  - A requirement that by 2023, every state agency, department, conservancy, board, commission, and council responsible for the implementation of 30x30, has designated staff to serve as the point of local contact for environmental justice groups and stakeholders.
  - A requirement that all consultants hired by the State to work with 30x30 stakeholders have a demonstrated capacity to moderate stakeholder interactions in a way that prevents and safeguards against discriminatory or racist behavior toward BIPOC and EJ community representatives. This could be achieved through a reference of work or background check process that obtains testimonials from prior BIPOC and EJ community stakeholders themselves.
  - A goal for all state agencies, departments, conservancies, boards, commissions, and councils responsible for the implementation of the 30x30 strategy to recruit, build, and maintain staff that actually reflect the state's diversity by 2030, along with a requirement to report on progress towards meeting the goal by 2025. The report may include progress made on hiring plans, budget requests, updates to recruitment processes and justifications.

10. Appropriate 70% of all funding for 30x30 implementation to community-led land acquisition, restoration, public access and transportation, recreation, education, climate resilience, or adaptation grant programs that directly benefit BIPOC and environmental justice communities, with the goal to improve their ability to participate in and enjoy the benefits of California's coast and ocean (i.e. OPC's Prop 1 Grants, Park's Outdoor Equity Grants, Park's Route to Parks Grants, CCC's Explore the Coast Program or Low Cost Accommodation Program, etc.).

Now more than ever before, California has an opportunity to be a global leader and redefine conservation with equity and environmental justice at the heart of how the 30x30 goal is reached. As stated in the [California Coastal Commission's Environmental Justice Policy](#), "there is no environmental justice without a healthy environment," and Azul believes all people have the right to access nature and a healthy environment. To ensure California prioritizes high biodiversity protection and access for BIPOC and environmental justice communities, environmental justice organizations like Azul look forward to supporting a strategy that achieves 30x30 through an equitable process.

Thank you for taking the time to consider our recommendations.

Sincerely,



Marce Gutiérrez-Graudiņš  
Executive Director  
Azul