



May 30, 2020 - REV

The Honorable Ash Kalra  
State Capitol  
P.O. Box 942849  
Sacramento, CA 94249-0027

Re: AB 3030 – Oppose Unless Amended

Dear Assembly Member Kalra:

The undersigned wildlife conservation organizations regretfully must “Oppose Unless Amended” position on your AB 3030 – legislation that would declare it a goal of the state to protect at least 30 percent of the land areas and waters within the state and 30 percent of the ocean waters off the coast of California by 2030.

We appreciate the opportunities your staff has provided us for dialogue with them and the sponsors. The conversations have been informative, both about the intentions of the sponsors of the measure and the purpose of the bill as they see it, and allowing for discussion of our interpretation and concerns.

However, despite these conversations, we remain very concerned about the broad and sweeping nature of the bill and its ambiguity. Unless the extent and impacts of existing protections on inland waters and lands are expressly acknowledged in this legislation, unnecessary closures may result – further restricting recreational angling and hunting opportunity, and possibly setting the stage for another contentious fight. We therefore must oppose this legislation, unless amended to expressly include:

- Specific language placed in the bill to acknowledge California’s role as a leader in wildlife and fishery conservation, recognize the role of bodies such as the California Fish and Game Commission in regulating and overseeing species management and harvest throughout California’s lands, inland waters and off our coast, and acknowledging the tremendous protections already in place throughout California’s lands, waters and oceans;
- Recognition of the importance of recreational angling and hunting to California’s environment in terms of the dollars and volunteer hours the conservation community invests in private and state funded programs, the voluntary habitat restoration efforts of private landowners on their lands, and the stated goals of the California Department of Fish and Wildlife in promoting increased participation in recreational angling and hunting;
- Clarification of some of the broad and ambiguous findings in the bill that, for example, state that existing protections are insufficient (without identifying specifics), and expressly defining words used in the bill – such as the word “protect” – to avoid future interpretation of the purpose of this bill being to restrict or deny legal recreational take of our fishery and/or wildlife resources.

The proposed language of the bill states that “it is the goal of the state to protect at least 30 percent of the land areas and waters within the state and 30 percent of the ocean waters off the coast of California by 2030.” No responsible angler or hunter would oppose this goal. Similarly, every responsible angler and hunter should support healthy biodiversity as well as thriving fishery and wildlife resources. The work our organizations do today are to support robust opportunities for anglers and hunters now, and for the generations to come.

That being said, while goals of AB 3030 are potentially laudable, many of these goals have already been accomplished in California’s marine environment, as well as in our inland lands and waters.

Working in partnership with the state and federal governments, hunters, conservation NGOs and others have worked to establish and best manage a sweeping network of state wildlife areas, National Wildlife Refuges, National Monuments, State Parks, ecological preserves, other public “protected” lands and private lands placed under conservation easements which arguably already exceeds the 30% land area protection goal called out in the bill.

Further, conversations with the sponsors have illuminated the scope and magnitude of the concerns they are seeking to address with this bill. Those items, among others, consist of pollution by onshore runoff, ocean acidification, rising sea temperatures, a loss of terrestrial biodiversity, loss of terrestrial natural areas, risk of extinction of terrestrial species, and climate change. Enacting further restrictions to hunting and fishing access and opportunity would provide no benefit towards addressing these concerns. Rather, further restrictions would reduce angler and hunter generated revenue available to address these issues and reduce the hunting and angling community’s incentive to partner in these efforts.

As specifically relates to language in the findings and operable sections of the legislation:

- Language in the operable section of the bill includes terms like “protect” and, for example, as proposed to be amended, a call for consideration of “how existing marine protected areas contribute to the goals” of the measure. The uncertainty around these terms – what does it mean to be “protected”, are traditional outdoor recreational pursuits compatible with “protections”, lead to ambiguity and confusion and concern among our communities. Further, how would such “protections” impact the ability of public and private landowners to manage these lands and waters to provide maximum wildlife and fishery habitat values? We hear how your sponsors interpret and describe this bill. However, it is likely that you will not be in office after 2030, and many of us will not be working in this same space at that time either. AB 3030 needs more clarity around these terms so that we all have a clear vision of what is proposed, should the bill become law.
- As proposed to be amended, the bill makes clear to sidestep a marine review process already underway, but in that regard may be premature in supposing that additional protections are necessary to any extent. Perhaps it would be better to wait for the definitive outcome of California’s review of its marine protections before establishing a further framework of possible unwarranted restrictions or closures.
- The bill enumerates a number of communities that shall be consulted on advancing the goals of this measure, but sportsmen and women are not included in their ranks. The bill states specific goals about improving access to nature for certain communities but does not include those whose recreational opportunities have shrunk over time as opportunities have declined due to increased management, regulations and other restrictions.

The International Union for Conservation of Nature and World Commission on Protected Areas (IUCN) has acknowledged the role of hunting in wildlife conservation and the significant benefits it provides to both game and threatened species and their natural habitats.

It is based upon all the above that we strongly urge you to consider the following proposed amendments:

Section 1:

(g) ~~The existing~~ Additional protections for land, water, the ocean, and wildlife in California and the United States ~~are insufficient~~ may be necessary to prevent a further decline of nature.

Move (h) to operable section of the bill (Section 2) and create a definition:

(h) 'Protect' or 'protection' means the establishment of enduring conservation measures on land, water and ocean areas of the State to ~~Protected land, water, and ocean areas~~ must support thriving biodiversity, contribute to climate resilience, and provide ecosystem services; ~~be established with enduring measures;~~ and managed so that their natural character, resources, and functions are conserved, ~~maximized,~~ and not impaired

for current and future generations. Well-managed and sustainable fishing and hunting practices with low ecological impacts are compatible with protected areas.

Create two new findings:

(m) California's recreational anglers and hunters provide substantial benefit to restoration, enhancement and protection of the natural habitats of California's game and non-game species via the annual revenues generated for the state through their purchase of license, stamps and tags; additional revenues provided our state for this purpose via excise taxes placed on hunting and fishing related equipment pursuant to the Federal Aid in Sport Fish Restoration Act and the Federal Aid in Wildlife Restoration Act; funding and on-the-ground efforts provided for these purposes via hunting and fishing related conservation organizations; and habitat restoration efforts of private landowners on their lands with hunting and fishing as their incentive.

(n) It is not the intent of the measure to further restrict, or limit, existing opportunities or access to wildlife-dependent recreational activities including hunting and fishing as defined in section 1571 (e) of the Fish and Game Code. Further, recognizing the economic value that conservation hunting and angling provide to meeting the state's conservation goals, it is the intent of the Legislature to expand those opportunities where appropriate and compatible with conservation priorities. It is also not the intent of this bill to, in any way, impede or restrict the ability of public or private landowners to best manage their lands to restore and enhance their wildlife and fishery habitat values. Finally, it is not the intent of the Legislature to impact the authority of the Fish and Game Commission in establishing the parameters under which locations, species, seasons, bag limits, and other regulations are defined.

## Section 2:

(a) It is the goal of the state to protect at least 30 percent of land areas and waters within the state and 30 percent of the ocean waters off the coast of California by 2030, inclusive of existing protections afforded by state and federal laws and regulations.

Also, create a Definitions section as proposed above for the word "protection", and possibly other terms.

Whatever abuses of land and ocean ecosystems that may exist around the world, the land, inland waters, and ocean waters off the coast of California are already well-protected through a combination of federal and state measures. This protection already exceeds the 30 percent goal of this legislation. We are justifiably concerned that this legislation, if not amended to recognize these existing protections and integrated approach, will serve as a vehicle to introduce additional closures to wildlife-dependent recreational activities such as fishing and hunting. The irony, of course, is that such go-it-alone closures would be the antithesis of "of an integrated approach to management" contemplated by the IUCN.

We are ready to work with you, your staff, and other stakeholders on amendments to address our concerns.

Sincerely,

Donn Walgamuth, President  
California Deer Association

Don Martin, President  
California Chapter – Wild Sheep Foundation

James Stone, President  
Nor-Cal Guides & Sportsmen's Association

Rick Travis, Director of Development  
California Rifle & Pistol Association

Mark Hennelly, V.P. of Government Relations  
California Waterfowl Association

Steve Chappell, Executive Director  
Suisun Resource Conservation District

Gary F. Brennan, President  
San Diego County Wildlife Federation

Aoibheann Cline, California State Director  
Congressional Sportsmen's Foundation

Fred Harpster, President  
The Black Brant Group

Adam Chavez, President  
California Hawking Club

Lori Jacobs, President  
California Houndmen for Conservation

Don Kirby, President  
Cal-Ore Wetlands and Waterfowl Council

Cathie Nelson, President  
San Francisco Bay Area Chapter - Safari Club International

Kevin Vella, District Biologist California/Nevada  
California State Chapter – National Wild Turkey Federation

Chriss Bowles, President  
California Bowmen Hunters/State Archery Association

cc: Members, Assembly Appropriations Committee  
Wade Crowfoot, Secretary, California Natural Resources Agency  
Chuck Bonham, Director, California Department of Fish and Wildlife