



May 23, 2024

The Honorable Wade Crowfoot, Chair,
and Honorable Members
California Ocean Protection Council
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

**Re: June 4 OPC Agenda item 7: 30x30 Decision-Making Framework for Coastal Waters;
and Agenda item 8.c: Consideration and Approval of Disbursement of Funds for
Humboldt Bay Eelgrass Distribution Mapping and Spatial Modeling**

Dear Secretary Crowfoot and members of the Ocean Protection Council,

Thank you for your ongoing leadership pursuing durable protection and management of the state's coasts and waters through 30x30 and other initiatives. The Pew Charitable Trusts (Pew) respectfully submits the following comments regarding two agenda items before the Ocean Protection Council (Council) at its June 4, 2024, meeting.

Agenda item 7: 30x30 Decision-Making Framework for Coastal Waters

Pew's U.S. conservation program seeks to sustain biodiversity and climate resilient ecosystems by collaborating with Tribal Nations, local communities, businesses, state and federal policymakers, and others to achieve balanced, commonsense policy solutions.

Consistent with these objectives, Pew hopes that 30x30 in California will seek to mitigate the threats most impacting the state's valuable lands and waters and supports strong criteria for "conserved areas". These criteria will set a precedent for conservation of coastal waters outside of marine protected areas and as such, we strongly recommend they are aligned with internationally approved criteria for Other Effective Conservation Measures,¹ which are an analog to California's Spatial Management Measures.

It is also important to consider how best to address land-based impacts on nearshore waters. For example, incompatible development and water pollution pose a major

¹Convention on Biological Diversity (2018). Protected areas and other effective area-based conservation measures. Decision adopted by the Conference of the Parties to the Convention on Biological Diversity, November 30, 2018. <https://www.cbd.int/doc/decisions/cop-14/cop-14-dec-08-en.pdf>

See also: Technical Note: Frequently Asked Questions on Establishing Marine OECMs under the Convention on Biological Diversity. 2024. <https://www.iucn.org/sites/default/files/2024-04/technical-note-marine-oecms.pdf>

threat to tidal wetlands, eelgrass meadows, and overall estuary health — sometimes more than impacts from unsustainable fishing. Additionally, sea level rise means tidal wetlands need room to migrate inland if they are to continue providing co-benefits to people and nature, including carbon storage and flood protection.

To address these challenges, the 30x30 effort must prioritize coordination across state government agencies and tap the expertise and experience across agencies, research institutions, NGOs, stakeholders, and Tribal Nations. Pew coordinates with scientists who have deep knowledge of estuarine ecology and management interventions in California. We, and our science partners, are interested in working closely with OPC and its Technical Advisory Panel, to ensure estuaries, coastal wetlands, and bays in California are durably protected as part of California's 30x30 Initiative, and we look forward to engaging in the upcoming public comment process.

Agenda item 8.c: Consideration and Approval of Disbursement of Funds for Humboldt Bay Eelgrass Distribution Mapping and Spatial Modeling

Pew enthusiastically supports the proposed Humboldt Bay Eelgrass Distribution and Spatial Monitoring project and encourages the Council to approve full funding of this important effort.

Eelgrass is one of the most important plants in the ocean. These habitats capture and store carbon, filter excess nutrients from the water, produce oxygen, and help protect coastal communities from floods and storm surge. Healthy eelgrass meadows also provide vital habitat for salmon, Dungeness crab, and other wildlife that are important to the region's economy.

This project will update eelgrass distribution mapping bay-wide (which has not occurred for over 15 years) and refine habitat models to inform restoration and mitigation opportunities. It will also develop spatial modeling to predict areas where eelgrass is most likely to thrive under future environmental conditions, which is critically important given the rapidly changing climate.

Pew has long advocated for science and ecosystem-based policy and management of eelgrass and other submerged aquatic vegetation at the local, state, and federal levels. This includes advocating for the successful development of the eelgrass habitat suitability modeling for San Francisco Bay, upon which this Humboldt Bay project is based. The proposed project is a natural next step to scale up eelgrass conservation efforts across the state. And given Humboldt Bay has the highest rate of sea level rise (SLR) in California,² combined with planning for offshore wind, agenda item 8.b is timely.

² Sullivan, Robert M. et al. (2022). Sea level rise vulnerability assessment for State wildlife areas surrounding Humboldt Bay, northern California. *California Fish and Wildlife Journal* 108: e24.

Protecting eelgrass in Humboldt Bay, home to more than one-third of California's remaining eelgrass,³ is also critical if the state is to achieve its ambitious eelgrass targets included in OPC's "Strategic Plan to Protect California's Coast and Ocean: 2020-2025,"⁴ protecting 30% of California's lands and coastal waters by 2030 and achieving the state's Nature-Based Solutions Climate Targets.⁵

Pew applauds California for its leadership in building a stronger and more adaptable environment for people and nature. In summary, we encourage the Council to pursue strong criteria for conserved coastal waters that align with international criteria; coordinate across agencies to address land-based impacts on nearshore waters; engage with scientists and other experts to determine how best to achieve those goals; and support the proposed "Humboldt Bay Eelgrass Distribution Mapping and Spatial Modeling" project as an important next step in protecting eelgrass in our state and encourage the council to fund this critical endeavor.

Thank you for your commitment to protect California's coast and ocean and for your consideration of these comments.

Sincerely,



Jos Hill
Project Director, U.S. Conservation - California
The Pew Charitable Trusts
415.994.7693
jhill@pewtrusts.org
<https://www.pewtrusts.org/en/projects/us-conservation>

<https://journal.wildlife.ca.gov/2022/11/22/sea-level-rise-vulnerability-assessment-for-state-wildlife-areas-surrounding-humboldt-bay-northern-california/>

³ Gilkerson, Whelan A. and Keith W. Merkel (2017). Humboldt Bay Eelgrass Comprehensive Management Plan. Prepared for Humboldt Bay Harbor, Recreation, and Conservation District, October 30, 2017, pgs 6-8.

https://humboltdbay.org/sites/humboltdbay2.org/files/documents/Humboldt%20Bay%20Eelgrass%20Management%20Plan_10-30-17.pdf

⁴ Ocean Protection Council (2020). Strategic Plan to Protect California's Coast and Ocean: 2020-2025. Feb. 28, 2020: <https://www.opc.ca.gov/webmaster/ftp/pdf/2020-2025-strategic-plan/OPC-2020-2025-Strategic-Plan-FINAL-20200228.pdf>

⁵ California Natural Resources Agency (2024). Nature-Based Solutions Climate Targets: as required by Assembly Bill 1757 (2022. C. Garcia): <https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/Californias-NBS-Climate-Targets-2024.pdf>