

On May 6, the Western Governors' Association (WGA) sent a letter to National Climate Advisor Gina McCarthy, expressing thoughts on the President Biden's recent directive to conserve at least 30% of the nation's lands and waters by 2030 (Executive Order (EO) 14008, Tackling the Climate Crisis at Home and Abroad). Section 216 of the EO directs the Secretary of the Interior to submit a report to the National Climate Task Force, proposing guidelines "for determining whether lands and waters qualify for conservation," as well as mechanisms to measure progress toward the 30% goal. The EO requires the members of the Task Force to engage with states, tribes, and local governments as necessary and appropriate.

WGA requested state consultation and cross-boundary coordination. "Western Governors appreciate that the Departments of the Interior and Agriculture and the White House Council on Environmental Quality have engaged with western states on aspects of the 30 by 30 proposal. These conversations have been helpful in understanding the scope of the Administration's proposal and have provided an important opportunity for states to articulate their concerns about the development of the Interior and Agriculture reports. We respectfully request that Western Governors be consulted during the Task Force's review of the Interior and Agriculture reports, and throughout subsequent consideration of the Governmentwide approach to combat the climate crisis."

Two of WGA's policy resolutions were included with the letter, #2021-01, Strengthening the State-Federal Relationship, and #2021-03, National Forest and Rangeland Management. The letter emphasized the importance of fostering a good faith partnership between states and the federal government, and the need for meaningful and ongoing consultation and collaboration. "Achieving an effective and durable 30 by 30 goal will require a significant expenditure of time and effort by all levels of government and must have the support of our constituents to ensure private landowner participation and community engagement in land planning processes. WGA suggests that the Administration consider multi-jurisdictional coordination through the Shared Stewardship Strategy of the U.S. Department of Agriculture (USDA). Pursuant to this initiative, WGA and 15 western states have signed some form of stewardship agreement with USDA. In total, 26 states and 3 regional organizations have entered into stewardship agreements with the Department. The Shared Stewardship model should be considered by other federal agencies seeking to engage in cross-boundary collaboration across governmental layers."

The letter continues: "Another effective mechanism for coordination and cooperation is the Western Governors' Task Force on Collaborative Conservation, which was formed by WGA to provide a venue for state and federal officials to engage in solutions-oriented dialogue on policies, programs, data-sharing efforts and other actions to collectively identify and prioritize actions to conserve and manage at-risk western wildlife populations and landscapes. The Task Force could provide a useful platform to promote regional conversations with western states on development and implementation of the Administration's 30 by 30 proposal."

WGA also expressed concerns about how the National Climate Task Force will define conservation, and whether the goals will disproportionately impact western states. "Western Governors contend that many of the federal, state, local, Tribal and private lands in our states already enjoy robust conservation protections. Adopting an overly stringent definition of 'conserved' that does not accommodate necessary management activities would have detrimental effects on ecosystem health and function. Such vital activities include wildfire mitigation, post-fire restoration, habitat improvement, and invasive species management. Conservation and the principle of multiple use are not mutually exclusive. The multiple uses of recreation, agriculture, renewable and traditional energy development, timber management and others contribute to the environmental, cultural and economic attributes of vibrant, healthy communities. Recognizing the distinction between preservation and conservation – and designing a definition to include conservation assets such as urban parks and conserved private lands – will benefit our constituents and landscapes. The 30 by 30 proposal should respect established land and water rights and the unique environmental, cultural and economic needs of communities. For Tribal communities, conservation and management efforts should protect cultural traditions, including hunting, fishing and land management practices." WGA did not take a position on the specific strategy that should be adopted, but noted that the governors "should be part of the dialogue between states and the federal government in developing and implementing the 30 by 30 proposal."

The letter concluded: "The 30 by 30 proposal has significant implications for state sovereignty and the lives of our constituents. Western states have a rich base of experience to inform the consideration of policies to implement the 30 by 30 proposal and the environmental safeguards needed to ensure the vitality of our citizens and landscapes. We look forward to working collaboratively and constructively with you to address the challenges our nation and our states face." https://westgov.org/images/editor/McCarthy_NCTF_WGA_Correspondence.pdf