



August 30, 2024

Jeff Mapes
New York State Department of Environmental Conservation
Albany, NY 12233-4254
Comments submitted via email to 30x30@dec.ny.gov

Dear Mr. Mapes and DEC staff:

On behalf of The Rewilding Institute (TRI) and its members in New York State, thank you for the opportunity to comment on New York's 30x30 Draft Strategies and Methodologies (30x30 draft).

TRI is a national non-profit organization that promotes scientific information on landscape-scale conservation and advocates for the protection of keystone wildlife species whose existence bolsters ecological resilience. Given our goals, we appreciate DEC's emphasis in the 30x30 draft on conserving open space and preserving biodiversity and offer the following suggestions to help achieve these goals.

Overall, we ask DEC to be **more ambitious in setting goals for the permanent protection** of land and waters in New York State. The draft should recognize that protecting at least 30 percent of the state's lands and waters by 2030, while essential, is not an end point but a step toward the scientifically **necessary goal of safeguarding 50 percent of natural areas by 2050**, as stated in the Global Biodiversity Framework of the Convention on Biological Diversity.¹ This broader "Half Earth" goal is increasingly recognized as an achievable minimum for stemming the biodiversity crisis and mitigating the worst impacts of the climate crisis.²

As DEC recognizes in the 30x30 draft (p.5), the loss and fragmentation of wildlife habitat is the single largest threat to biodiversity. Given this, we encourage DEC to **follow the widely acknowledged International Union for the Conservation of Nature (IUCN) categories of protected areas** when establishing priorities for land protection in New York State. This would mean that most of the land included in the 30x30 goal would be permanently protected as IUCN category 1, strict nature reserves and wilderness areas—or the ecological equivalent, with full protection from commercial exploitation being the most critical need. These areas should then be supplemented by category 2, national parks, and category 3, national monuments.³

TRI strongly encourages DEC to **prioritize investment of resources in habitat connectivity**, which the agency recognizes in the 30x30 draft (p. 3) as essential to combating increasingly developed and divided landscapes. Achievement of the imperative climate and biodiversity goals reflected in the 30x30 and Half Earth strategies will only be possible if large, permanently protected areas are interlinked, allowing for full ecosystem functioning and the genetic diversity and resilience of wide-ranging species.

Some of the plans and current measures to strengthen corridors and connectivity are delineated in the 2016 New York State Open Space Conservation Plan, which the 30x30 draft ostensibly follows. However, DEC should **clarify how the 30x30 draft tracks with the Open Space Conservation Plan** and, specifically, how the agency will in actuality prioritize corridors and connectivity in its 30x30 work. Additional detail on this connection to the Open Space Conservation Plan would further establish the agency's commitment to avoiding the accounting of a patchwork of smaller, randomly located lands and waters when working toward longer-term conservation goals. In addition, we encourage DEC to leverage the Wildlands Network's Eastern Wildway map and The Nature Conservancy's Resilient Land Mapping Tool, which enable users to understand where many key habitat linkages are located.⁴

DEC's language relating to the **list of places "contributing to 30x30" (pp. 8-9) is confusing** with regard to the distinction between lands and waters that support the state's "objectives" versus being part of the achievement of "conservation." What the former means should be clarified to avoid misinterpretation by readers and planners and in order to be consistent with DEC's later statement (p. 10) that "areas without protection" were not, in fact, included in the agency's assessment of baseline conditions.

Given the importance of distinguishing between true and potentially transient protection statuses, **DEC's explanation of how it assessed "baseline conditions" (p. 9) warrants clarification.** DEC emphasizes that there is a mosaic of private and public lands and various types of open space throughout New York State, that the agency relied on various databases that include tenuously protected land categories (e.g., cemeteries and logged forests), and that areas with higher levels of protection were "counted first." Additional information on which lands were weighted and how is necessary for readers to fully understand current conditions and to avoid the potential underestimation of how much more acreage must be fully protected in order to achieve 30x30 goals.

We appreciate DEC's emphasis in the 30x30 draft (pp. 11-14) that several existing state and federal programs will be leveraged to achieve greater protection of land and water. However, while **actions through some of these programs result in permanent protection status, others do not.** DEC indicates throughout the 30x30 draft that several categories of land will be included in the achievement of the 30x30 goal as long as they have some level of protected status.

Although certainly critical for sustaining localized ecosystems and human activities, areas such as sustainably managed farmland and 480A forest management lands should not be included in the scoping and strategies necessary to achieve 30x30. These areas are continually subjected to human-induced changes (e.g., by commercial exploitation and motorized vehicles) that over time weaken the climate and biodiversity benefits anticipated through the achievement of 30x30 goals (and eventually Half Earth goals).

TRI's view is that currently, the only lands and waters throughout New York that clearly qualify for 30x30 include Forest Preserve lands in the Adirondack and Catskill Parks (noting that motorized recreation in these areas is a non-compliant use in those areas); lands protected with Forever Wild conservation easements held by land trusts; fully-protected riparian buffers within larger partially protected easement lands; strictly protected parts of National Wildlife Refuges and National Seashores; and private lands permanently protected through a legally binding covenant.

Further, lands that should be considered as qualifying at some point in the future—that is, only when commercial exploitation and human-caused manipulation of core ecological functions are phased out—include State Forests, Wildlife Management Areas, and Forest Tax Law lands.

Going forward, DEC could achieve permanent protection of additional lands through the regulatory development of supplementary **categories of private lands that are managed solely for purposes such as carbon sequestration and ecological function**. For example, forest and farmland management programs could be developed as 480C, for climate, or 480E, for ecology. These protection statuses would prioritize the ability of forests to respond naturally to changes, rather than solely supporting direct and short-term human needs.

Similarly, regulated wetlands with a “persistent” protection status can be more easily exploited than those with the permanent protection status afforded by ownership by a conservation entity or through a “forever wild” conservation easement. Going forward, DEC could leverage maps of wetlands and undeveloped waterways to **identify areas where permanent protection status is possible and should be achieved**—rather than currently considering these areas as an end-point for inclusion in the 30x30 goal.

Thank you for your time and attention. Please feel free to contact us with any questions or for additional information.

Sincerely,

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¹ Executive Summary of the Report of the Second Bogis-Bossey Dialogue for Biodiversity: Note by the Executive Secretary. <https://www.cbd.int/post2020/doc/sbi-02-inf-35-en.pdf>

² See the work and scientific basis of E.O. Wilson’s Half Earth Project, <https://eowilsonfoundation.org/glossary/half-earth/>

³ International Union for the Conservation of Nature, “Guidelines for Applying Protected Area Management Categories,” <https://portals.iucn.org/library/sites/library/files/documents/PAG-021.pdf>

⁴ See Wildlands Network, Eastern Wildway Map, <https://www.wildlandsnetwork.org/newsroom/eastern-wildway-map>; and The Nature Conservancy, Resilient Land Mapping Tool, <https://www.maps.tnc.org/resilientland/#/explore>