

July 30, 2025



Jenn Eckerle, Deputy Secretary of Ocean and Coastal Policy
California Ocean Protection Council (OPC)
715 P Street, 20th Floor, Sacramento, CA 95814

Re: Ocean Protection Council's Draft 2026-2030 Strategic Plan

Dear Deputy Secretary Eckerle and Council Members,

On behalf of The Pew Charitable Trusts (Pew), thank you for the opportunity to comment on the Ocean Protection Council's (OPC) Draft 2026-2030 Strategic Plan. We commend OPC for its continued commitment to its four goals stated in the draft Strategic Plan: 1) build resilience to climate change, 2) maximize community benefits and stewardship, 3) safeguard coastal and marine biodiversity, and 4) enable a sustainable blue economy that protects ocean health. Having engaged in multiple OPC in recent years, our organization appreciates the depth and breadth of the work achieved by agency staff.

Pew's U.S. Conservation program advances common sense solutions that address the impacts of a changing environment on nature and communities, in collaboration with policymakers, Tribes, and stakeholders. Pew's specific interests and recommendations related to OPC's 2026-2030 Draft Strategic Plan are:

- **A proposed 5th Strategic Plan Goal** uplifting OPC's existing statutory role to recommend policy changes to the Governor and Legislature
- **Tribal Nation-led marine stewardship** through co-management and co-creation of policies to protect, restore, and manage estuarine, nearshore, and offshore waters (*reflected in Objective 2.1 and Targets 2.2.4 and 3.2.3*)
- **Increased protection and climate-informed, adaptive management for tidal wetlands and other estuary habitats** to ensure no net loss and long-term net gain of these habitats and the services they provide (*reflected in Objectives 1.1, 3.2 and Targets 3.1.3, 3.3.3 and 3.3.5*)

Proposed 5th Goal uplifting OPC's existing statutory role to recommend policy changes to the Governor and Legislature

Since its inception in 2004 via the California Ocean Protection Act, OPC has played critical roles in consistently coordinating across multiple-agency and multi-jurisdictional ocean and coastal activities, convening on specific initiatives, funding state and local agencies, sovereign Tribal governments, stakeholders, scientists, and more for the "protection and conservation of coastal waters and ocean ecosystems to improve the effectiveness of state efforts to protect ocean resources."¹ This effort is reflected in the breadth and depth of the work contemplated in the draft Strategic Plan.

¹ California Public Resources Code (PRC) Division 26.5, California Ocean Protection Act (2004) - https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=26.5.&title=&part=&chapter=3.&article=

These comprehensive efforts notwithstanding, OPC could make better use of existing statutory provisions outlined in Public Resources Code (PRC) Division 26.5 - California Ocean Protection Act², specifically:

- 35615(a)(6) - *Identify and recommend to the Legislature changes in law needed to achieve the goals of this section.*
- 35615(b)(1) - *Identify changes in federal law and policy necessary to achieve the goals of this division and to improve protection, conservation, and restoration of ocean ecosystems in federal and state waters off the state's coast.*
- 35615(b)(2) - *Recommend to the Governor and the Legislature actions the state should take to encourage those changes in federal law and policy.*

Recommendation: OPC staff and leaders create a new, 5th Goal around identifying and recommending to the Governor and Legislature changes in law needed to achieve OPC goals and statutory responsibilities

The challenges that coastal and marine habitats and human communities are facing demand clear, action-oriented recommendations from entities that best understand what is happening now on California's lands and waters. Given its multiple roles at the intersection of science, policy, sovereign and community engagement and other relevant state agency work, OPC is well suited to recommend policy changes and should do so, as the enabling statute envisions, for both state and federal law (see 35615(a)(6), (b)(1), and (b)(2) above).

One potential recommendation from OPC to the Legislature is policy and funding needed to ensure that key components of climate-ready natural resource management are resourced and reflected in statute. For this we encourage OPC to consider Pew's white paper on 5 principles for climate-ready management.³

Tribal Nation-led marine conservation through co-management, co-creation of policies to protect, restore, and manage estuarine, nearshore, and offshore waters

Pew strongly supports all four Targets of Objective 2.1 *Strengthen partnerships with California Native American tribes*:

- 2.1.1 - *By 2027, develop and implement a strategy for the recognition and co-stewardship of Indigenous Marine Stewardship Areas (IMSAs), with at least one new IMSA recognized by 2027.*
- 2.1.2 - *By 2028, support the continued success and growth of the Tribal Marine Stewards Network by providing funding to further scale up the Network, with at least three new tribes participating.*
- 2.1.3 - *By 2030, provide funding to support the return of 500 acres of coastal land to tribes.*
- 2.1.4 - *By 2030, support the completion of at least five new agreements that expand tribal access to the coast and ocean between the State and tribes.*

² *Ibid.*

³ The Pew Charitable Trusts - U.S. Conservation project, 2024. Climate Ready Management Plans (CRMP): Principles and Key Elements of Managing Natural Resources in the Face of Climate Change (white paper).

<https://drive.google.com/file/d/1UuD7Kkntone5fuuR8AxcM2EgtXC5ZYHA/view?usp=sharing>

Additionally, Pew supports:

- *Objective 2.2, Target 4: By 2028, fund at least three projects that advance community- or tribally-led scientific research and monitoring.*
- *Objective 3.2, Target 3: By 2027, in partnership with California Native American tribes, the Department of Fish and Wildlife, and the Fish and Game Commission, develop pathways for tribal co-management and co-stewardship of MPAs.*

As a [supporter and partner](#) of both the Tribal Marine Steward Network and the Yurok-Tolowa-Dee-ni' Indigenous Marine Stewardship Area (IMSA), we applaud OPC's redoubling of its effort on these initiatives. Additionally, Pew supported and worked to pass AB 1284 which clarifies and encourages co-management agreements between Tribal Nations and the state.⁴

Recommendations:

- OPC should operationalize the intent and content of AB 1284 (Tribal co-management) and encourage other California Natural Resource Agency (CNRA) agencies to do so. Pursuant to the first recommendation above (re: 5th goal), this could include policy and appropriations recommendations to the Legislature for the implementation of AB 1284 and other related initiatives and statutes
- Also pursuant to the first recommendation above, OPC should identify changes in federal law and policy necessary to achieve OPC goals and recommend to the Governor and the Legislature actions the state can take to encourage those changes. This may become critically important, for example, given uncertainty around the fate of the Chumash Heritage National Marine Sanctuary.⁵

Increased protection and climate-informed, adaptive management for tidal wetlands and other estuary habitats to ensure no net loss and long-term net gain of these habitats and the services they provide

We applaud the consideration of estuaries throughout the draft Strategic Plan, reflected directly and indirectly through:

- *Objective 1.1: Protect communities and ecosystems from the impacts of sea level rise, coastal storms, erosion, and flooding, and associated Targets:*
 - *1.1.1 - By 2029, update the State of California's Sea Level Rise Guidance with best available science and recommendations for use in adaptation plans and projects.*
 - *1.1.2 - Fund the development and implementation of sea level rise adaptation plans to protect people and nature. Ensure that plans are in place for the entire California coast by 2034 and fund at least ten projects by 2030 that implement strategies in approved adaptation plans.*
 - *1.1.3 - By 2027, identify beaches and coastal parks most at risk from sea level rise, erosion,*

⁴ California Legislature (2024): Tribal Co-governance of Ancestral Lands and Waters Act (AB 1284 - Tribal ancestral lands and waters: cogovernance and comanagement agreements) -

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB1284

⁵ Public News Service, "CA Ocean Protection Council adopts roadmap to protect 30% of waters by 2030," Suzanne Potter, Producer, June 13, 2025 - <https://www.publicnewsservice.org/2025-06-13/public-lands-wilderness/ca-ocean-protection-council-adopts-roadmap-to-protect-30-of-waters-by-2030/a97238-1>

and coastal flooding; fund at least five priority adaptation projects to preserve public access and habitat along the coast by 2030.

- *1.1.4 - By 2027 and building on previous collaborative efforts, identify contaminated sites most vulnerable to rising groundwater and sea levels and share through a regularly updated public dashboard; fund at least three projects by 2030 to address contamination risks to underserved communities and the environment, with a focus on improving public access and restoring impacted habitats.*
 - *1.1.5 - By 2028, collaborate with partner agencies and others to develop a statewide strategy and guidance to support sediment management and beneficial reuse of dredged materials for coastal adaptation and resiliency projects.*
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- *Objective 3.1, Target 3: By 2027, fund at least three projects that address threats to biodiversity in estuaries.*
 - *Objective 3.2: Strengthen the performance and durability of California’s Marine Protected Area (MPA) Network. And associated targets:*
 - *3.2.1 - By 2027, develop science-based recommendations to support ongoing adaptive management of the MPA Network.*
 - *3.2.2 - By 2027, establish clear MPA performance targets and develop an updated MPA Monitoring Action Plan to evaluate progress toward those targets.*
 - *3.2.3 - By 2027, in partnership with California Native American tribes, the Department of Fish and Wildlife, and the Fish and Game Commission, develop pathways for tribal co-management and co-stewardship of MPAs.*
 - *3.2.4 - By 2028, develop a statewide framework to strengthen water quality protection across the MPA Network; by 2030, ensure at least five MPAs currently without water quality protection have safeguards equivalent to Areas of Special Biological Significance.*
 - *Objective 3.3, Target 3: Restore at least 1500 acres of coastal wetlands, 100 acres of native oyster beds, and 200 acres of eelgrass meadows by 2030.*
 - *Objective 3.3, Target 5: By 2030, fund at least three land acquisition projects that increase opportunities for coastal habitat restoration and upland migration in the face of sea level rise.*

Estuaries—areas where rivers meet the sea—are among California’s most valuable natural resources. The seagrass meadows, salt marshes, and forested tidal wetlands that thrive in healthy estuaries provide food and shelter for salmon, Dungeness crab, and other species that support commercial and recreational fishing and Tribal Nations; sustain seabirds and marine wildlife that are important for tourism; capture and store greenhouse gases; ease the local effects of ocean acidification; and protect coastal communities from sea-level rise, storms, and flooding.

Given their location at the intersection of marine and terrestrial ecosystems, and therefore subject to stressors and threats from both areas, estuary habitats present protection and management challenges for state agencies in the context of 30x30^{6,7}, California Air Resources Board’s Scoping Plan⁸, California’s Nature-

⁶ California Natural Resource Agency (2022). Pathways to 30x30 California - https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf

based Solutions Climate Targets⁹, and other initiatives. This makes OPC's exploration of estuaries even more important.

Recommendations:

- As OPC moves forward to implement its final *Roadmap to Achieving 30x30 in California's Coastal Waters*¹⁰ and the associated decision tree (page 11), OPC should act on the recommendations from the Baylands and Estuary Science Toward 30x30 (BEST 30x30) working group¹¹ along with previous comments from Pew and partners at the California Marine Sanctuary Foundation and Coastal Policy Solutions.¹² Additionally, ensure that the public understands the geospatial boundary, ideally through a specific map layer, for what are considered "waters", and by extension, "lands" in the context of 30x30.
- Pursuant to the first recommendation above (re: 5th Goal), OPC should recommend to the legislature policy and funding changes needed to achieve OPC's objectives and targets related to tidal wetlands and other estuary habitats. One example of this could be found by exploring the challenges that led OPC to reduce its initial 2020-2025 wetland goal (Target 1.1.7: Work with partners to ensure an additional 10,000 acres of coastal wetlands will be protected, restored or created by 2025, and increase the acreage of coastal wetlands in California, as defined by the coastal wetlands inventory described below, by 20% by 2030 and 50% by 2040¹³) to the draft 2025-2030 Strategic Plan Goal and Target (3.3.3 - Restore at least 1500 acres of coastal wetlands, 100 acres of native oyster beds, and 200 acres of eelgrass meadows by 2030¹⁴).
- In the interest of achieving *Objective 1.1: Protect communities and ecosystems from the impacts of sea level rise, coastal storms, erosion, and flooding*, OPC should make recommendations to the Legislature that address concerns from California communities¹⁵ about the implementation of SB 272 (2023) regarding sea level rise planning and adaptation, specifically that new standards for sea level rise adaptation are merely *considered* as opposed to *required*.

⁷ California Legislature (2024) - SB 337: Environmental protection: lands and coastal waters conservation goal - https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB337

⁸ California Air Resources Board, Final 2022 Scoping Plan Update – Achieving Carbon Neutrality by 2045, December 2022, <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>

⁹ California Natural Resources Agency, *California's Nature-Based Solutions Climate Targets*, April 22, 2024, <https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/Californias-NBS-Climate-Targets-2024.pdf>

¹⁰ Ocean Protection Council (2025) Roadmap to Achieving 30x30 in California's Coastal Waters, June 2025 - <https://opc.ca.gov/wp-content/uploads/2025/07/Roadmap-to-Achieving-30x30-in-Californias-Coastal-Waters-508.pdf>

¹¹ Baylands and Estuary Science Towards 30 x 30 workgroup (2024) Letter to Re: OPC's 30x30 Draft Decision-Making Framework for Coastal Waters, 10-2-24 - <https://drive.google.com/file/d/1DhgLcAGXHLPVBQSUQoYY-LDYu63-lJcl/view?usp=sharing>

¹² Pew Charitable Trusts, California Marine Sanctuary Foundation, Coastal Policy Solutions (2024) Letter to OPC Re: Comments on OPC's 30x30 Draft Decision-Making Framework for Coastal Waters, 9-27-24 - https://drive.google.com/file/d/1ZcqHqLIQjExO5Wa_qOC5aAzN3V-Gpdhn/view?usp=sharing

¹³ Ocean Protection Council (2020) - <https://www.opc.ca.gov/webmaster/ftp/pdf/2020-2025-strategic-plan/OPC-2020-2025-Strategic-Plan-FINAL-20200228.pdf>

¹⁴ Ocean Protection Council (2025) Roadmap to Achieving 30x30 in California's Coastal Waters, June 2025 - <https://opc.ca.gov/wp-content/uploads/2025/07/Roadmap-to-Achieving-30x30-in-Californias-Coastal-Waters-508.pdf>

¹⁵ KQED Radio (2024), "The Bay Area Now Has Its First-Ever Regional Sea Level Rise Plan," by Ezra David Romero, 12-6-24 - <https://www.kqed.org/news/12016813/bay-area-now-has-first-ever-regional-sea-level-rise-plan>

Thank you for the opportunity to comment on OPC's draft 2026-2030 Strategic Plan and for OPC's continued work to protect California's coast and ocean.

Regards,

A handwritten signature in dark ink, appearing to read "Bobby Hayden", with a stylized flourish at the end.

Bobby Hayden
Officer, U.S. Conservation
The Pew Charitable Trusts