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The Honorable Deb Haaland
United States Secretary of the Interior
US Department of the Interior
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Dear Secretary Haaland,

My heartfelt congratulations on your historic appointment to lead the U.S. Department of Interior. My successor in Congress from the 2nd Congressional District of Colorado, Rep. Joe Neguse, speaks very highly of you and I look forward to meeting you in person. We are also particularly excited by the increased presence of the Bureau of Land Management in Grand Junction, Colorado and Lakewood, Colorado and we look forward to working towards our mutual success. I have great confidence in your ability to thoughtfully adjust priorities and guide your department into a new era.

President Biden has laid out ambitious goals for America's efforts to combat climate change, conserve biodiversity and natural resources, promote equitable and inclusive environmental decisions, and nurture emerging renewable energy economies and industries. Colorado looks forward to expanding our partnership with your office and Interior agencies in realizing these objectives in our state and beyond.

To this end, in his January 25 and 27 executive orders (E.O.s 13990, 14998, respectively), the President directed federal agencies to determine how they plan to operationalize the Administration's social, economic, climate and conservation agenda. He tasked the Secretary of Interior, among other things, with: identifying approaches for increasing renewable energy production and conserving 30 percent of the nation's lands by 2030; reviewing the federal oil and gas program; standing up a Civilian Conservation Corps initiative; and contributing to community revitalization and greenhouse gas reduction strategies.

Potential solutions to these challenges can be found in some of the environmentally responsible and economic development oriented approaches that Colorado has pioneered. We're investing in emerging agricultural markets and methods; growing tourism and outdoor recreation in rural communities; innovating technologies and advancing regulatory requirements to reduce the emissions and environmental impacts of energy production; helping to transition from legacy plants to renewable generation, and helping communities transition in a just way from coal-dependent industries. As a state defined by iconic wildlife, natural resources, and lands, stewardship is central to how Colorado does business.

Specifically, I'm proud of the work my administration has done, and the leadership Colorado has shown in consensus-driven conservation work including wildlife corridors¹, advancing the CORE Act and

¹ <https://www.colorado.gov/governor/news/gov-polis-signs-executive-order-conserve-colorado-wildlife-and-habitat-while-protecting-public>

Fishers Peak State Park, creating the Colorado Outdoor Regional Partnerships Initiative², and challenging the Uncompahgre Resource Management Plan among other efforts to ensure Colorado's treasured and vast outdoors and the benefits to its citizens remain intact for future generations. We have also championed bold action on climate, clean energy jobs and an equitable transition to a clean energy economy with recent releases of both the Greenhouse Gas Pollution Reduction Roadmap³, the Just Transition Action Plan⁴ and Climate Equity Framework⁵.

Below, my administration and I offer perspectives informed by our state's experiences, which may prove instructive as you begin to consider your responses to the President's directives. I hope to have the opportunity to discuss this input, and a number of other priorities that undoubtedly overlap given the connectedness of our lands, wildlife and people in more detail with you in the near future.

Sincerely,

A handwritten signature in blue ink that reads "Jared Polis". The signature is written in a cursive, flowing style.

Governor Jared Polis

² <https://cpw.state.co.us/aboutus/Pages/News-Release-Details.aspx?NewsID=7640>

³ <https://www.colorado.gov/governor/news/3986-gov-polis-releases-colorados-greenhouse-gas-pollution-reduction-roadmap>

⁴ <https://cdle.colorado.gov/sites/cdle/files/documents/Colorado%20Just%20Transition%20Action%20Plan.pdf>

⁵ <https://cdphe.colorado.gov/air-pollution/climate-change#:~:text=The%20state%20of%20Colorado%20is,racial%20equity%20and%20economic%20justice.>

Colorado Perspectives: Conservation of Lands and Waters by 2030

There is ample scientific evidence to suggest that achieving protections for thirty percent of the earth's lands and waters by the year 2030 is an important milestone along the path to reversing global biodiversity loss and climate change, and to ensuring that natural systems can continue to provide critical ecosystem services that support human habitation. Colorado applauds the Biden Administration's embrace of this target and appreciates the significance of the United States' contributions to this global initiative.

It is worth acknowledging, however, that the "30x30" initiative, while promising, is still nascent. To be successful, it is important for all stakeholders to arrive at accepted guidance as to the specific conservation outcomes associated with the target, conditions that should be characterized as "protected," or tools best suited to achieve desired protections. It will be imperative to address these questions if "30x30" is to serve as a meaningful indicator of America's progress toward a more sustainable future. Ecosystems don't adhere to national, state or other human boundaries, which makes collaboration and consensus building a critical part of this discussion at every level, and success will be realized by enlisting individuals and communities as partners in this laudable effort.

To the extent that input from governments seeking to achieve similar environmental targets can help to inform the Department of Interior's plans for incorporating 30x30 targets in federal agency operations and actions, Colorado offers the following insights and priorities for your consideration:

Process and Design Recommendations for Federal 30x30 Planning:

1. Focus on outcomes as opposed to arbitrary metrics

- DOI and the Administration should identify the qualitatively-defined biological, climate and social conditions or outcomes (e.g., landscape connectivity, priority wildlife habitat; carbon sequestration, climate resilience, equitable benefits) that can be achieved by an integrated 30x30 strategy and supported by appropriate measurable indicators, and resist the temptation to over-emphasize quantitative targets, such as total acreage under protective land designations. The strategy should prioritize those lands and resources that are best positioned to contribute to one or more of these outcomes, and look for opportunities to deliver community and cultural co-benefits, such as sustainably planned outdoor recreation and public access, sustainable food and fiber protection, etc.

An "outcomes-focused" strategy should also incorporate careful monitoring, scenario planning and adaptive approaches designed to facilitate course adjustments in response to changing environmental, climate, social conditions and priorities. Collaborative, long-term and sustainable planning is key, as with our Colorado Outdoor Regional Partnerships Initiative.

- The Nature Conservancy's Resilient and Connected lands project offers a suite of tools and resources for resiliency-based conservation planning.⁶

⁶ The Nature Conservancy, Resilient and Connected Lands gateway, <http://www.conservationgateway.org/>

- Colorado’s “Outdoor Regional Partnerships Initiative” seeks to engage local leadership in creating and realizing long-term, sustainable outdoor recreation, conservation and economic development planning and projects. ⁷

2. Bolster State, Tribal and U.S. Territorial Priorities and Initiatives

- DOI and the Administration should coordinate closely with states, U.S. territories, and hold government-government consultation with Tribes, and follow their leads with respect to wildlife management, water and other resources not under primary federal jurisdiction, and in all matters of Tribal sovereignty. Additionally, Federal 30x30 efforts should not undermine relevant conservation and climate mitigation initiatives already underway within these jurisdictions, and should seek to integrate with them to the extent practicable, and add value through financial and technical assistance, and by supporting cross-jurisdictional coordination.

For instance, Colorado has developed ground-breaking regulatory frameworks and strategic plans designed to meet aggressive environmental and climate targets, and encourage responsible development, and manage priority species of flora and fauna. Some examples include:

1. *Greenhouse Gas Pollution Reduction Roadmap (2021)* - Sector-specific implementation plan for helping state agencies reach 100% renewable energy via 2025, 2030, 2040 and 2050 emissions reductions targets, and increase carbon sequestration, especially on natural working lands ⁸
2. *Oil and Gas Regulations (2021)* - Overhauled oil and gas regulations to prioritize protection of public health, safety, welfare, and the environment -- including robust restrictions on methane emissions for oil and gas development, and restrictions on new development in the most important wildlife habitats ⁹
3. *Clean energy standards for utilities (updated 2016)* - Colorado passed the first voter-led Renewable Energy Standard (RES) in the nation, requiring electricity providers to obtain a minimum percentage of their power from renewable energy sources
4. *State Forest Action Plan (2020)* - Specifies management actions and recommendations for achieving forest health stewardship goals including ecosystem and wildlife habitat conservation, wildfire risk reduction, watershed protection, and carbon sequestration ¹⁰
5. *Regional Outdoor Partnerships* - Governor Jared Polis issued an executive order directing Colorado’s Division of Parks and Wildlife (CPW) to coordinate with regional coalitions around the state to develop plans for balancing conservation and

⁷ Colorado Parks and Wildlife, Outdoor Regional Partnerships Initiative [CPW News Release](#).

⁸ Colorado Energy Office, Greenhouse Gas Pollution Reduction Roadmap, January 14, 2021, available online: <https://energyoffice.colorado.gov/climate-energy/ghg-pollution-reduction-roadmap>

⁹ Colorado Oil and Gas Commission, SB 181 Rules, January 14, 2021, <https://cogcc.state.co.us/>

¹⁰ Colorado State Forest Service, State Forest Action Plan (2020), available online: <https://csfs.colostate.edu/media/sites/22/2020/10/2020-ForestActionPlan.pdf>

recreation values, and through this initiative will also develop a Statewide Conservation and Recreation Plan ¹¹

6. *Colorado's Water Plan Update* - The Colorado Water Conservation Board is in the process of revisiting the state's 2015 water plan to better align with evolving water use priorities, supply needs and conditions, and revise 2030 and 2050 conservation and resiliency goals. ¹²
7. Endangered Fish Recovery - 3 Recovery Programs (Platte River, San Juan, Upper CO) [forthcoming CWCB]

3. Ensure Inclusive Decision-Making and Implementation

- An inclusive 30x30 process will yield more defensible plans and benefits to historically disadvantaged and underserved communities. DOI should design 30x30 processes to be inclusive of a broad set of interests and perspectives, with robust, ongoing participation among: minority, rural, non-tribal indigenous, and other underserved populations; communities that have historically been disproportionately affected by environmental decisions and policies.
 - Colorado's Climate Equity Framework offers one model of inclusive environmental decision-making guided by principles of racial equity and economic justice
- In addition, DOI should meaningfully engage private landowners and organizations, including land trusts, industry associations, and the like, to ensure that private interests are considered and to understand how private activities and resources can best be leveraged toward strategic objectives.

4. Work within the Framework of Western Water Law and Administration

- Western water is governed by layered interjurisdictional compacts obligations and administered by states according to a system of priority usufructuary rights, presenting unique challenges -- exacerbated by climate-induced drought conditions -- that must be carefully navigated when it comes to both terrestrial and aquatic conservation planning. It will be critical for DOI to account for these complexities in developing 30x30 plans, and coordinate closely with states on an ongoing basis to address regional and state supply needs.

Conservation, Stewardship and Restoration Priorities:

The devastating impacts of the 2020 North American wildfire and hurricane seasons underscored the urgent need for integrated strategies to address public safety and community resiliency concerns alongside conservation and climate mitigation objectives. For instance, the Cameron Peak and East Troublesome fires in northern Colorado burned a combined 400,000 acres of forest and grassland ecosystems, damaged infrastructure and directly threatened water supplies.¹³ 30x30 presents an

¹¹ Executive Order B 2020 008, *Creating the Colorado Outdoor Regional Partnerships Initiative and Establishing the Interagency Conservation and Recreation Council*

¹² Colorado Water Conservation Board, Colorado Water Plan Update: <https://engagecwcb.org/colorado-water-plan-update>

¹³ See <https://peakstopeople.org/wp-content/uploads/2017/05/cse-wrfrontrangefinalreport.pdf>

opportunity to look through multiple lenses” to design tailored approaches, rooted in an appreciation of ways in which interconnectedness of human and natural systems. Below, we outline some of the objectives especially important in our state that should be taken into consideration:

1. Large landscape and wildlife habitat connectivity

- Reducing fragmentation and disturbance across large landscapes is critical for conserving biodiversity natural system functionality. Landscape connectivity allows for free movement within and between wildlife habitat, effective seed dispersal and hydrological flows; inhibits the spread of pathogens and invasive species, and can reduce the severity of natural disasters, among countless ecological and societal benefits. Western states, for instance, in collaboration with private, local and federal government partners, have increasingly sought to promote connectivity along migration and movement corridors used by elk, deer, pronghorn and other big game species, and to protect native ecosystems such as sagebrush steppe and shortgrass prairie that are at-risk from encroaching development, damaging land use practices, and the influences of climate change.¹⁴ DOI and other federal agencies can advance landscape connectivity on public lands directly through protective designations, planning objectives and other approaches, and are also uniquely positioned to support the long-term planning and cooperation that are necessary for implementing landscape-level conservation strategies across other jurisdictions.¹⁵

2. Watersheds that protect critical drinking water sources

- Colorado, known as the Headwaters State is home to the headwaters of four major river basins: the Platte (northern Front Range), the Arkansas (southern Front Range), the Rio Grande (southern Colorado), and the Colorado River (Western Colorado), and collectively supplies water to 7 states and Mexico. The Colorado River, from its origin on the western slope of the Continental Divide in Rocky Mountain National Park, provides drinking water to over 36 million people, irrigates over 4 million acres of farmland, supports a \$26 billion water-based recreation economy, and sustains 30 native fish species and riparian habitat for many others. The Upper South Platte, Upper Arkansas, Cache La Poudre, and Big Thompson watersheds supply the growing Front Range communities.

3. Vulnerable ecosystems that support the restoration and protection of priority native wildlife species, such as Greater Sage Grouse, Gunnison Sage Grouse, gray wolf, wolverine and American bison, and big game species species, including elk, mule deer, pronghorn and bighorn sheep.

- In Colorado, these include sagebrush steppe, shortgrass prairie, alpine tundra, riparian areas, wetlands and river corridors, among others.¹⁶ Many of these ecosystems have been dramatically altered by persistent drought conditions exacerbated by climate change, pest outbreaks, invasive species incursion, fossil fuel development, over-grazing and other damaging land use practices.
- The Colorado Division of Parks and Wildlife and Department of Natural Resources are working with DOI agencies and other federal partners to implement plans to protect ESA-

¹⁴ Plowright et al., Land use-induced spillover: a call to action to protect environmental, animal and human health, *The Lancet Planetary Health*, March 5, 2021. Available online: [https://doi.org/10.1016/S2542-5196\(21\)00031-0](https://doi.org/10.1016/S2542-5196(21)00031-0)

¹⁵ Center for Large Landscape Conservation, U.S. Policies to Conserve Ecological Connectivity, Nov, 2020. Online: <https://largelandscapes.org/wp-content/uploads/2020/11/U.S.-Policies-to-Conserve-Ecological-Connectivity-Since-2007.pdf>

¹⁶ Decker et al., Guide to Ecological Systems of Colorado, Colorado Natural Heritage Program, Colorado State University, Fort Collins, 2020.

listed Gunnison Sage Grouse, at-risk Greater Sage Grouse, big game species, and the support the reintroduction of gray wolves, as approved by Colorado voters in 2020.

4. Working agricultural and forest lands that support critical food and fiber production and provide co-benefits to state and local climate and conservation objectives
 - Working agricultural lands provide important ecosystem services ranging from carbon sequestration to wildlife habitat. According to the American Farmland Trust's (AFT) State of the States report, Colorado has lost 234,900 acres of agricultural land to urban development between 2001 and 2016.¹⁷ The AFT report includes spatial mapping of farmland best suited for food/fiber production, which can provide a resource in developing private land conservation strategies.
 - As an example, the Colorado State Trust Land 2026 Strategic Plan - sets actionable goals for land stewardship practices and land resilience in the face of climate change.¹⁸
5. Lands, such as forests, wetlands and grasslands, that are effective in capturing atmospheric carbon to combat climate change
6. In-stream surface water flows, and groundwater sources that support of terrestrial and aquatic ecosystems and non-consumptive human uses
 - In-stream surface flows are important to a variety of native species throughout Colorado. For example, the Upper Colorado River Basin is home to 14 native fish species, including the endangered humpback chub, bonytail, Colorado pikeminnow, and razorback sucker, which are endemic to the Colorado River system.

Conservation Tools and Mechanisms:

1. Maximize outcomes by drawing upon a flexible and comprehensive suite of conservation tools beyond permanent, protective land designations and fee title acquisitions, including: local, state and federal management prescriptions; voluntary, incentive-based private land conservation and stewardship programs.
 - As you are aware, an initiative like 30x30 can easily be misunderstood or misconstrued as a threat to private landowners, yet time and again voluntary incentives prove incredibly valuable economically for private land-owners and rural communities. Voluntary incentives can be strengthened to reflect the changing needs of conservation in a climate impacted West. With 57% of the Colorado's lands under private ownership, private lands and the voluntary support of private landowners, are critical to the success of any statewide natural resource or land conservation plan. Colorado is pioneering innovative approaches, such as annual and per acre payment programs to keep lands and waters out of development, pooled funding, a habitat exchange partnership, and investigating alternatives to "fair market" valuation for conservation easements donated under the state's tax credit program to better reflect public ecosystem service benefits.
 - An example of a more traditional voluntary, incentive-based program, the Colorado Wildlife Habitat Program (CWHP) offers opportunities for private landowners to voluntarily protect important wildlife habitat and to provide recreational access to the public through perpetual conservation easements, access

¹⁷ Freegood et al., Farms Under Threat: State of the States Report, American Farmland Trust, Washington, DC, 2020

¹⁸ Colorado State Land Board, 2026 State Trust Land Strategic Plan, available online: <https://slb.colorado.gov/about>

agreements, and other programs.¹⁹ Alternatively, the RESTORE Colorado Program provides a model for achieving land restoration objectives at scale through a pooled resource partnership.²⁰

7. Encourage strategies, such as infrastructure clustering, to steer disturbance and development away from areas that present a high degree of conflict with priority wildlife, land connectivity, and ecosystem functionality objectives
 - For instance, federal agencies can incentivize renewable and fossil fuel energy development outside of priority conservation areas through streamlined permitting processes, or other mechanisms. The Colorado Oil and Gas Commission's recently revised regulations to include recommendations for avoiding, minimizing and mitigating wildlife and ecological impacts from fossil fuel development based on extensive research and public input.²¹ Responsible renewable siting is an emerging area of applied research warranting further investment and investigation to identify appropriate approaches to climate-responsible energy development compatible with other ecological objectives.²²
8. Incentivize innovative strategies that contribute to groundwater recharge in drought-prone regions
 - For example, the San Luis Valley Confined Aquifer Recovery Project in Southern Colorado's Rio Grande Basin will utilize innovative conservation easements with groundwater recovery provisions to assist in recharging the local aquifer, which is critical to the region's economy and natural landscapes.
 - Colorado also partners with the Republican Water Conservation District to incentivize reductions in irrigation in the High Plains to conserve aquifer resources, reduce negative environmental impacts, and restore streamflow.
9. Incentivize forest management practices on public and private land that that maintain forest cover and restore resilient forest structure to promote forest health and resiliency
 - For instance, the recent extension of eligibility for USDA's Conservation Reserve Program to include forest management practices will help engage private landowners in supporting state and federal forest health priorities. Additionally, federal agencies can condition federal funding on state and local action to limit new home construction (and other development) in fire prone areas.

¹⁹ Colorado Division of Parks and wildlife, Colorado Wildlife Heritage Program, <https://cpw.state.co.us/cwhp>

²⁰ Colorado RESTORE Program, National Fish and Wildlife Federation, <https://www.nfwf.org/programs/rocky-mountain-rangelands/restore-colorado-program>

²¹ Colorado Oil and Gas Commission Rules (effective January, 2021): <https://cogcc.state.co.us/reg.html#/rules>

²² See, e.g., Agha et al., "Wind, Sun and Wildlife: Do Wind and Solar energy development 'short circuit' conservation in the Western United States?," Environmental Research Letters, IOPscience, 2020. <https://iopscience.iop.org/article/10.1088/1748-9326/ab8846>