June 29, 2026

Astrid Schomaker
Secretariat of the Convention on Biological Diversity
413 Rue Saint-Jacques, Suite 620
Montreal, QC, H2Y 1N9, Canada

Dear Executive Secretary Schomaker:

We want to recognize and appreciate the United Nations for its central leadership in elevating the importance of protecting nature, and for making tangible progress to conserve biodiversity for the long-term health of ecosystems and communities around the world.

As a global biodiversity hotspot, California is seeing firsthand the impacts of the climate and nature crises. Over the past decade, the state has endured its longest and most severe drought on record, repeated years of extreme heat and catastrophic wildfires, and the widespread collapse of kelp forests off our northern coastline. Climate change and biodiversity loss pose existential threats to California's lands, waters, native species, and ecosystem services, which support nearly 40 million people.

Recognizing the urgency of this moment, California is committed to taking bold action to conserve biodiversity, strengthen climate resilience, and protect the natural systems on which both people and nature depend. In recent years, our state has emerged as an important global leader on biodiversity, first establishing our own goal to conserve 30% of California's lands and coastal waters by 2030, then traveling to COP 15 in 2022 to successfully advocate for the inclusion of 30x30 in the Kunming-Montreal Global Biodiversity Framework. Since that time, we have made aggressive progress toward our 30x30 goal, with 26.1% of California's lands and 21.9% of coastal waters conserved as of June 2025. Achievements include:

- More than 1 million hectares of conserved areas, including 16,000 hectares of land return to California Native American tribes;
- Nearly 78,000 hectares of conserved coastal waters, including the new tribally co-managed Chumash Heritage National Marine Sanctuary;
- Inclusion of California's marine protected area network on the International Union for Conservation of Nature's Green List of Protected and Conserved Areas as the global

gold standard for marine conservation; and
- Investment of more than $1.3 billion in state funding to advance conservation efforts and passage of a $10 billion Climate Bond to fund 30x30 and other state priorities in coming years.

We have also helped build a global community of practice around 30x30 and advanced effectiveness through subnational action, including joining key subnational government coalitions such as the Convention on Biological Diversity's Advisory Committee on Subnational Governments, launching the Subnational Government Task Force of the High Ambition Coalition in partnership with Quebec, and becoming one of the first two U.S. states to join the International Union for Conservation of Nature as subnational government members, along with Massachusetts.

It is in this leadership role that we wish to offer comments on the First Draft of the Global Report on Collective Progress in the Implementation of the Kunming-Montreal Global Biodiversity Framework. Overall, the Global Report indicates that the world has made measurable strides towards the Global Biodiversity Framework (GBF) targets, including 30x30. However, despite these efforts, progress is not advancing quickly enough, and the world is not on track to meet GBF targets. The Global Report makes it abundantly clear – we need to move further and faster to protect nature, and this will require stronger action at all levels of government.

Recognizing the critical role of subnational governments in driving biodiversity action is an important step toward accelerating progress. We are pleased to see that the Global Report acknowledges subnational and local governments as key partners, with strong references to subnational contributions throughout the document. However, we believe there are several places where discussion of subnational governments could be elevated and strengthened. To that end, we support the comments submitted by the Advisory Committee on Subnational Governments and also offer our own high-level reflections on the Global Report:

- National-level progress toward GBF targets is used as the main metric of progress throughout the report. This does not provide an opportunity to distinguish subnational contributions from national contributions. The Global Report should indicate where subnational action is driving meaningful progress, for example through case studies or by utilizing data from dedicated platforms for monitoring and reporting progress at the subnational level, such as RegionsWithNature. This would also better recognize the essential role of subnational leadership in cases where national-level action is limited or absent, as is currently the case in the United States.

- Subnational governments are briefly and generally discussed in the section on Target 3 (30x30) as non-national actors "commonly involved in the implementation of Target 3." This discussion should be expanded to include specific actions that

subnational governments are undertaking to achieve 30x30, including managing effective protected and conserved areas, executing strategic land acquisitions, building partnerships, investing in science and monitoring, and partnering with indigenous peoples and local communities.

- Throughout the report, the role of subnational governments should be more clearly distinguished from that of other non-national actors, such as non-governmental organizations. Subnational governments play important and outsize roles in delivering progress toward GBF targets that are distinct from those of other non-national actors. The report would also benefit from expanded discussion of existing mechanisms, initiatives, and coalitions that support subnational governments in working to achieve Global Biodiversity Framework targets, such as the Advisory Committee on Subnational Governments and the High Ambition Coalition Subnational Government Task Force.

More detailed comments and suggestions are provided using the Convention's template for review comments, attached to this letter. We look forward to participating in continued discussions around the report and collective progress toward the global 30x30 goal and other GBF Global Biodiversity Framework targets, including through attendance at COP 17 this fall.

We appreciate the work of the Convention on Biological Diversity in developing this rigorous report, offering the opportunity for peer review, and considering our comments. Though sobering, we hope that the Global Report inspires Parties to the Convention and other actors, including subnational and local governments, to raise ambition in these last years remaining before 2030. The health of both people and nature depends on it.

We will be attending COP 17 in Armenia with a large subnational delegation and hope to meet with you or your team to map out how California can continue to play an important role in conserving biodiversity across the world.

Sincerely,



Wade Crowfoot
California Secretary for Natural Resources