



County of Del Norte
Board of Supervisors
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6/19/26

The Honorable James C. Ramos
California State Assembly
1021 O Street, Suite 8230
Sacramento, CA 95814

RE: AB 53 (Ramos) – Opposition Unless Amended

Dear Assemblymember Ramos:

I am writing in my capacity as a Del Norte County Supervisor to express my Opposition Unless Amended position on AB 53 (Ramos), relating to Native American tribes and conservation and mitigation lands. Due to the timing of legislative deadlines, this letter is being submitted pursuant to the Del Norte County Administrative Manual, which authorizes legislative comment letters to be transmitted prior to formal Board consideration when the letter is consistent with the Board's adopted Legislative Platform. This matter will be presented to the Del Norte County Board of Supervisors for consideration at its next regular meeting.

Del Norte County recognizes and deeply values the cultural, historical, and governmental relationships that California Native American tribes maintain with their ancestral lands. The County has longstanding government-to-government relationships with local tribal governments, including the Tolowa Dee-ni' Nation, Elk Valley Rancheria, and Yurok Tribe, and supports collaborative approaches to ecological restoration, habitat conservation, responsible resource management, and tribal stewardship.

I support the portions of AB 53 that expand opportunities for tribes to participate in California's conservation programs, including eligibility for grants and loans under the California Riparian Habitat Conservation Program and the Inland Wetlands Conservation Program. However, two provisions of the bill raise significant concerns regarding long-term land management, public accountability, and the ability of local governments to understand and comment on decisions affecting lands within their jurisdictions.

First, the bill authorizes the California Department of Fish and Wildlife to enter into management agreements with federally recognized tribes for department-managed lands under Fish and Game Code Section 1745 while exempting those agreements from Public Contract Code requirements that would otherwise apply. While I support collaborative management opportunities, the bill does not require affected counties to receive notice or have an opportunity to comment regarding agreements that may influence local land use, public access, emergency response, and long-term resource management.

Second, AB 53 expands the existing exemption under Public Resources Code Section 5096.516 to allow conservation lands to be transferred to federally recognized tribes without the public hearing and legislative authorization process that would otherwise apply to such transfers. I am concerned that this change would remove important public transparency and local input mechanisms for decisions involving conservation lands located within county boundaries.

These concerns are particularly significant in rural counties such as Del Norte, where substantial portions of the landscape are already publicly owned or otherwise unavailable for traditional economic development. Decisions affecting the ownership, management, and long-term stewardship of conservation lands can have implications for public access, wildfire preparedness and emergency response, land use compatibility, economic activity, and local fiscal sustainability.

I am also concerned about the legal and practical implications that may arise if conservation lands transferred to a tribe are later proposed for federal trust status through the federal fee-to-trust process. Such a conversion may substantially alter the jurisdictional framework governing the property and may affect the applicability of certain state regulatory requirements. AB 53 does not address how existing conservation obligations, public access protections, or other long-term management commitments would be preserved and enforced under those circumstances.

Similarly, management agreements, conservation easements, and other contractual arrangements involving federally recognized tribes may involve unique legal considerations related to tribal sovereign immunity, federal approval requirements, enforceability, and available remedies. These issues do not diminish the value of tribal stewardship, but they warrant careful consideration to ensure that conservation objectives, public investments, and long-term obligations remain adequately protected.

The concerns expressed in this letter are consistent with Del Norte County's adopted 2026 Legislative Platform, which supports policies requiring early notice and consultation with affected local governments before transfers of state or federal property to tribal governments and opposes actions that diminish public access or create unfunded obligations for counties.

Accordingly, I respectfully request that AB 53 be amended to require affected counties receive notice and a meaningful opportunity to comment before the California Department of Fish and Wildlife enters into a management agreement with a tribe under Fish and Game Code Section 1745, or before conservation lands are transferred to a tribe pursuant to the exemption contained in Public Resources Code Section 5096.516.

I have no objection to the underlying intent of AB 53 and support expanded opportunities for tribal stewardship of conservation lands. I believe that tribal stewardship, environmental protection, and meaningful local government engagement are complementary objectives. I remain committed to working collaboratively with your office, tribal governments, and other stakeholders to develop amendments that address these concerns while preserving the bill's important conservation goals.

Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by a horizontal stroke.

Chris Howard
Supervisor, District 3
Del Norte County Board of Supervisors

CC: Honorable Mike McGuire, Member of California State Senate
Honorable Chris Rogers, Member of California State Assembly
Honorable Members of the Del Norte County Board of Supervisors
Karen Lange, SYASL