



August 13, 2020

The Honorable Anthony J. Portantino  
Chair, Senate Appropriations Committee  
State Capitol, Room 3086  
Sacramento, CA 95814

RUSSELL KAGEHIRO  
President  
Division V

TIM MAGGIORE  
Vice President  
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CHARLES TUSO  
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Division VI

JEFF BROWN  
Director  
Division VII

RICK GILMORE  
General Manager  
Secretary

**RE: AB 3030 (Kalra) - Resource conservation: land and ocean conservation goals (Oppose Unless Amended)**

Dear Chair Portantino:

On behalf of Byron-Bethany Irrigation District (BBID), I am writing to express our "Oppose Unless Amended" position on AB 3030, a bill related to land and water conservation goals. The bill as written would create a costly, confusing, and likely contentious state policy that would fail to promote the collaboration necessary to achieve meaningful conservation in California.

AB 3030 would create a statutory commitment for California to protect 30 percent of the state's land area and waters and to help advance protection of the nation's oceans by 2030. BBID is fully committed to protecting California's rich biodiversity and the water resources upon which many species and people depend. BBID is a multi-county special district, serving parts of Alameda, Contra Costa, and San Joaquin Counties. The District provides reliable, efficient water, serving 160 agricultural customers and more than 20,000 residents of the Mountain House community. BBID takes very seriously its role as a steward of our region's natural resources.

The intent of AB 3030 is laudable, and we appreciate the author's commitment to conservation and making California a leader in environmental protection. Unfortunately, as the bill's language is largely declaratory, it is unclear how the Legislature intends for the administration to achieve the goals laid out in the bill. The definition of "protection" does not provide any metrics for measuring success, nor does it establish an existing baseline that indicates how close California currently is to achieving the stated goal of "protecting" 30 percent of California's land and water. In the context of water, the bill does not describe whether the goal would be achieved through enhanced water quality, water conservation, and/or setting aside a percentage of unimpaired flows for habitat purposes. This could have serious consequences for water management in California.

The fiscal effects of this bill are also concerning, especially as local governments continue to weather a recession brought on by this global pandemic.

The Assembly Appropriations Committee estimated this bill could result in costs of “several hundreds of millions of dollars or more.” The author has not identified a funding source for this bill, leaving water agencies like BBID to wonder whether they will bear some of the costs. In light of the drastic budget cuts implemented to close California’s \$54 billion deficit, AB 3030 does not align with the fiscal priorities identified by legislative leadership and Governor Newsom.

Finally, the bill makes no meaningful acknowledgment of the litany of state and federal environmental laws and regulations already protecting California’s natural resources. Waters in California are already subject to robust protections, so it is unclear how the state would reconcile the goal of this bill with existing law. However, the broad language in the bill appears to authorize state agencies to meet the stated goal by expanding their existing authority through permitting processes and rulemaking. This would surely lay the groundwork for future regulatory battles and merely serve as fodder for future litigation.

The Association of California Water Agencies submitted amendments to Assembly Member Kalra on August 4 that would address the concerns summarized above. We understand he has not agreed to accept those amendments. We hope he will reconsider, but, in the absence of those amendments, we must urge your “NO” vote on AB 3030 when it is heard in the Senate Appropriations Committee.

For these reasons, Byron Bethany Irrigation District urges the amendment of this legislation to address the significant issues outlined above and stands ready to work with the author and this committee to improve this legislation.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Rick Gilmore". The signature is fluid and cursive, with a large initial "R" and "G".

BYRON BETHANY IRRIGATION DISTRICT  
Rick Gilmore  
General Manager