



September 20, 2015

The Honorable Edmund G. Brown
Governor of California
State Capitol Building
Sacramento, CA 95814

Re: AB 313 (Gray): Water - SUPPORT

Dear Governor Brown:

The above listed organizations support Assembly Bill 313, which would upgrade the state's water management structure and restore fairness that all water right holders deserve.

AB 313 would upgrade the administration of California's water rights and enforcement programs by addressing conflicts of interest in the existing system where state agencies operate as judge, jury and prosecutor. The current system of managing California's water, our most precious resource, simply does not work.

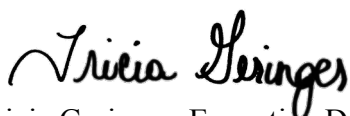
The current system provides the State Water Resources Control Board authority over allocating water rights and permits, enforcing those rights and allocating the punishment, if they believe there has been a violation by a water user. This action is intended to be quasi-judicial. However, water rights hearings are held by appointed water board members using their own staff as investigator and prosecutor while the board members themselves acted as judge and jury. Additionally, they have inadequate structural separations of duties to effectively serve the quasi-judicial functions. The current system creates an inherent challenge for the board to provide a fair hearing and appropriate judicial review when the board serves as investigator, prosecutor, judge and jury.

AB 313 establish a Water Rights Division within the Office of Administrative Hearings to conduct hearings requested by persons issued a complaint by the executive director of the State Water Resources Control Board for violations of diversion and use of water, yet maintaining the final decision authority with the executive director.

The bill attempts to reform the system and promote efficiency and fairness. By moving some of the functions and reforming the system, the water board can focus on important issues such as water quality.

In closing, we urge you to sign AB 313 as we support the bill's approach to addressing the conflicts of interest and inherent biases in the current broken system. Thank you for considering our views on this important legislation.

Sincerely,



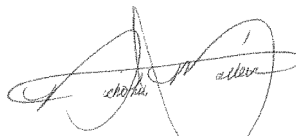
Tricia Geringer, Executive Director
Agricultural Council of California



Kelly Covello, President
Almond Alliance



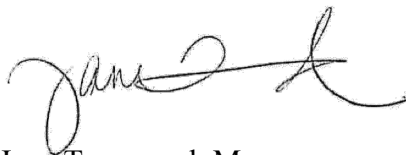
Debra Murdock, Executive Director
Association of California Egg Farmers



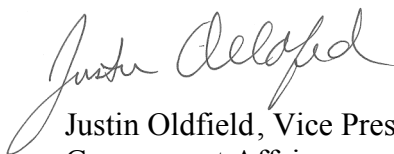
Nick Matteis, Executive Director
California Association of Wheat Growers



Michael Miiller, Director, Government Relations
California Association of Winegrape Growers



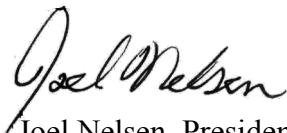
Jane Townsend, Manager
California Bean Shippers



Justin Oldfield, Vice President
Government Affairs
California Cattlemen's Association



Valerie Nera
Policy Advocate
CalChamber



Joel Nelsen, President
California Citrus Mutual



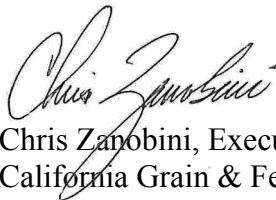
Roger Isom, President, CEO
California Cotton Ginners & Growers
Association



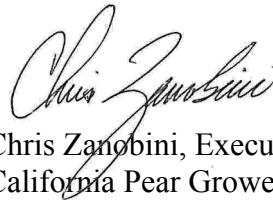
Danny Merkley, Director, Water Resources
California Farm Bureau Federation



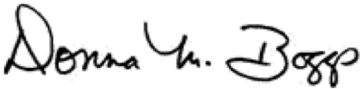
George Radanovich, President
California Fresh Fruit Association



Chris Zanobini, Executive Director
California Grain & Feed Association



Chris Zanobini, Executive Director
California Pear Growers Association



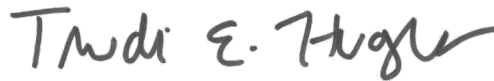
Donna Boggs, Associate Director
California Seed Association



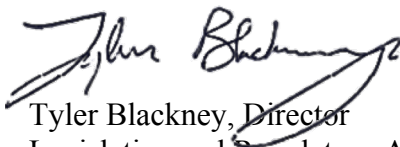
Ann Quinn, Executive Vice President
California Warehouse Association



Jodi Raley, Director, Regulatory Affairs
Western Agricultural Processors



Trudi Hughes, Director, Government Affairs
California League of Food Processors



Tyler Blackney, Director
Legislative and Regulatory Affairs,
California Wine Institute



Gail Delihant
Director, California Governmental Affairs
Western Growers Association

Cc: Assemblymember Adam Gray