



CITY OF OCEANSIDE

August 19, 2020

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

RE: AB 3030 (Kalra) - Resource conservation: land and ocean conservation goals - OPPOSE

Dear Chair Portantino:

On behalf of The City of Oceanside, I am writing to oppose AB 3030, a Bill related to land and water conservation goals.

The City of Oceanside is fully committed to protecting California's rich biodiversity and the water resources upon which many species and people depend. Oceanside is actively pursuing beneficial water reuse projects including construction of an advanced water purification facility and expanding recycled water pipelines. These projects will improve the water quality in our groundwater basin, surface water, and ocean through the reduction of secondary treated wastewater disposal to the Pacific Ocean.

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. 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, the ambiguity of this bill would create a costly, confusing, and likely contentious state policy that would fail to promote the collaboration necessary to achieve meaningful conservation in California.

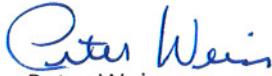
As the Bill's language is largely declaratory, it is not clear how the Legislature intends for the administration to achieve the goals laid out in the Bill. The definition of "protection" does not provide any metrics for measuring success, nor does it establish an existing baseline that indicates how 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 the 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 to wonder whether they will bear some of the costs.

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 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 urge your "NO" vote on AB 3030 when it is heard in the Senate Appropriations Committee.

Sincerely,



Peter Weiss

Mayor

Cc: Oceanside City Council
Senator Bates - Vice Chair Senate Appropriations Committee