

December 11, 2025

Assemblymember Bryan
Chair, Assembly Natural Resources Committee
1020 N Street, Suite 164
Sacramento, CA 95814



**RE: SUPPORT – AB 35 (Alvarez): Proposition 4 Administrative Procedure Act (APA) Exemption
SET FOR JANUARY 12, 2026**

Dear Chair Bryan,

On behalf of the undersigned organizations, we write in strong support of AB 35 (Alvarez), which would exempt Proposition 4 spending from the Administrative Procedure Act (APA). The signatures below represent a broad community of stakeholders, including many environmentally focused organizations that played a critical role in advocating for Proposition 4’s passage on the November 2024 ballot.

Exempting Proposition 4 funding from the APA is consistent with long standing precedent for natural resource bonds, including Proposition 84 and Proposition 68. A full exemption would enable funds to be deployed more quickly and efficiently, ensuring that protracted administrative processes do not hold up vital community projects. Agencies such as the State Water Resources Control Board (SWRCB), the Department of Water Resources and the Department of Food and Agriculture have noted that a standard process, complete with review by the Office of Administrative Law (OAL), could result in delays of 12 to 18 months before communities receive awards. These delays run counter to overwhelming support of the voters for Proposition 4 and their desire to see needed projects start in a timely manner. In fact, there are pressing issues such as border rivers, groundwater recharge, water recycling, and wildfire prevention that require immediate funding. Existing programs were created using the processes dictated by prior bonds. Hence, the programs most able to spend funds quickly will be forced to needlessly restructure them to meet the regulatory requirement established by the September Appropriations bill. For example, the SWRCB’s drinking water funding program will be adversely impacted since under the current rules, all funding sources within the program are covered under the SWRCB’s Intended Use Plan (IUP), which allows flexibility in which sources of funding are used for different projects, and the IUP includes Proposition 4 funds. Without the exemption from the APA process, the Prop 4 funding would have to be backed out of the IUP and limit the ability to use a broad mix of funding to achieve the State’s goals of providing a safe and reliable drinking water supply.

Importantly, an exemption from the APA does not eliminate transparency, consultation, or public engagement. Agencies will continue to follow robust fiscal, reporting, and oversight requirements. Many agencies have already gone through extensive public processes for these existing programs. Instead, the exemption will streamline implementation, maintain consistency across programs, and avoid creating barriers to delivering critical funding where it is most needed.



Without an APA exemption, the delays already emerging threaten the success of essential projects across the state, including many that are shovel ready. Providing this exemption will accelerate timelines, reduce administrative burdens, and honor the commitment voters made to California's communities.



For these reasons, we strongly support a full exemption from the APA for all Proposition 4 funding.

East Contra Costa County
Habitat Conservancy

Sincerely,



Agricultural Institute of Marin
Association of California Water
Agencies (ACWA)
Bay Area Council
Bay Area Ridge Trail Council
Bay Planning Coalition

East Bay Regional Park District
East Contra Costa County Habitat
Conservancy
Eastern Municipal Water District
Endangered Habitats League
FHBP, Friends of Harbors Beaches and
Parks



Big Sur Land Trust
Bolsa Chica Land Trust
CA Local Conservation Corps
Foundation
CalDesal
California Association of Local
Conservation Corps
California Association of Resource
Conservation Districts
California Climate and Agriculture
Network
California Council of Land Trusts
California Fire Chiefs Association

Fire District Association of California
Fresno EOC Local Conservation Corps
Greater Valley Conservation Corps



California Habitat Conservation
Planning Coalition
California Invasive Plant Council
California Municipal Utilities
Association
California State Association of
Counties (CSAC)
California State Parks Foundation
California Stormwater Quality
Association (CASQA)
Calleguas Municipal Water District
Carbon Cycle Institute
Central California Environmental
Justice Network
Cesar Chavez Environmental Corp
(CCEC)
Civicorps
Clean Water Action

Irvine Ranch Water District
Land Trust of Santa Cruz County

League of California Cities

Los Angeles Conservation Corps

Los Angeles Neighborhood Land Trust
Midpeninsula Regional Open Space
District
Mission Spring Water District

Monterey One Water
Napa County Regional Park and Open
Space District
Orange County Conservation Corps

Outward Bound Adventures (OBA)
Peninsula Open Space Trust

Placer County Water Agency
Rails to Trails Conservancy
RCD of Greater San Diego County

Rural County Representatives of
California (RCRC)
Sacramento Area Sewer District
Sacramento Regional Conservation
Corps
San Diego County Water Authority
San Diego Zoo Wildlife Alliance
San Geronio Pass Water Agency
San Joaquin Valley Water Collaborative
Action Program

San Jose Conservation Corps
Santa Margarita Water District
Save Mount Diablo

Conservation Corps North Bay
Conservation Corps of Long Beach
County of San Diego



Upper San Luis Rey
Resource Conservation District





RESOURCE CONSERVATION DISTRICT
Greater San Diego County

SLOUGHHOUSE
Resource Conservation District



AG + OPEN SPACE
SONOMA COUNTY



Carbon Cycle Institute



AIM
AGRICULTURAL INSTITUTE OF MARIN



Wildlife Conservation Network



NAPA COUNTY REGIONAL PARK & OPEN SPACE DISTRICT



California Habitat Conservation Planning Coalition



San Luis & Delta Mendota Water Authority
Santa Clara Valley Open Space Authority
Save the Redwoods League
Sempervirens Fund
Sequoia Community Corps
Sloughhouse Resource Conservation District
Sonoma County Ag + Open Space
Sonoma Land Trust
Sonoma Water
Southern California Mountains Foundation
Southern California Water Coalition
TEAMRCD
The Conservation Fund
The Freshwater Trust
The Nature Conservancy
The San Diego Natural History Museum
The Wilderness Society
The Wildlands Conservancy
Upper San Luis Rey Resource Conservation District
Urban Corps of San Diego County
Valley Water
Water Blueprint for the San Joaquin Valley Advocacy Fund
WaterReuse California

the nat
SAN DIEGO NATURAL HISTORY MUSEUM



CENTRAL CALIFORNIA ENVIRONMENTAL JUSTICE NETWORK



COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA



CALIFORNIA STORMWATER QUALITY ASSOCIATION



Water Blueprint
for the San Joaquin Valley
Advocacy Fund



Climate Resolve



PROUDLY SERVING OUR COMMUNITY SINCE 1993

ORANGE COUNTY CONSERVATION CORPS



LEAGUE OF CALIFORNIA CITIES



SAN GORONIMO PASS WATER AGENCY
Established 1961



Santa Margarita Water District



Bay Planning Coalition



Transforming Youth. Enhancing Communities.

