



GROUNDWATER RESOURCES ASSOCIATION
O F C A L I F O R N I A

September 30, 2004

California Performance Review Commission
Office of the Governor
Constituent Affairs
State Capitol
Sacramento, CA 95814

Re: CPR Comments by the Groundwater Resources Association of California

Dear Members of the CPR Commission:

The Groundwater Resources Association of California (GRA) was formed in 1992 to promote the protection and sustainability of groundwater resources and to serve as a forum for groundwater information, education and advocacy. Our more than 1,000 members from every region in California come from government agencies, universities, consulting firms, non-profit organizations, business and industry, specific interest groups, and the public. Our members represent diverse perspectives, which allow GRA to provide comprehensive coverage of issues with academic and professional credibility.

GRA has considered the California Performance Review (CPR) recommendations in light of our Legislative Guidelines, a copy of which is attached for your review and consideration. Our Legislative Advocate (Chris Frahm, Hatch & Parent) has attended many of the CPR hearings. Most recently, GRA conducted a 2-hour panel presentation and open forum with members to solicit comments and perspectives on CPR. This letter is intended to describe in general terms some of the areas of interest and concern to our members.

Given the length and breadth of the Report and the time available to review it, we have largely confined our initial review and consideration to those sections of the Report that are most relevant to the concerns of our membership – specifically, the consolidation of all water, water quality and environmental functions under the newly proposed Departments of Infrastructure, Environmental Protection and Natural Resources and related changes and implications.

Against this backdrop, we offer the following summary comments and suggestions.

- Assessment of State Government. We join with many others in commending the Governor for his leadership in bringing this very ambitious initiative forward. A more efficient and responsive state government is a stronger, more effective government for all Californians. We also appreciate and commend the effort and hard work of the many people who participated in drafting the report, and, the members of the Commission who have dedicated hundreds of hours to reviewing the report and receiving public testimony. We look forward to working with you and continuing to participate in the next steps of the process; and, we stand ready to offer technical and policy assistance in any areas in which we may be helpful.
- Statewide Water Policy. GRA's Mission Statement expressly encourages the formulation of a statewide policy on the development, management and protection of the state's groundwater resources. Accordingly, we strongly concur that California needs a clearly articulated statewide water policy and believe that it should promote integrated groundwater management, sustainability, and protection at state, regional and local levels.
- Public Participation. A number of the CPR proposals, including those to eliminate the State and Regional Water Boards, could have a negative impact on the opportunity for the public and regulated community to participate in the regulatory and policy making process. While GRA has not taken a position to oppose this or any other recommendations of the CPR, we strongly believe that any proposal that would eliminate or unduly restrict participation of the public and regulated community should be approached with caution and due respect for the role that public participation plays in reaching successful outcomes.
- Local and Regional Planning. Any restructuring should recognize that comprehensive multidisciplinary approaches to water supply planning and groundwater issues including sustainability are best managed on a regional or watershed basis in order to address water quality problems and other threats to groundwater resources. Such an approach must necessarily include the support of water rights holders and the participation of local stakeholders.
- Water Rights and Water Quality. GRA believes that water rights must be respected and water quality protected. Water rights and water quality regulatory functions should not be separated.
- Consistency of State Law and Policy. While GRA has reserved judgment on many of the proposed structural changes, we believe that a mechanism must be developed to ensure consistent state law and policy. Given a statewide policy, the State and Regional Water Boards provide an established infrastructure for applying state policy to local conditions.

- Efficiency. GRA believes that the Regional Boards have historically been underfunded and understaffed and that this has adversely impacted the ability of the Regional Water Boards to accomplish their mission. Consideration should be given to the extent to which problems, particularly those with broad future water quality implications, could be addressed by the provision of adequate staffing and funding.
- Local Assistance Programs. Local assistance programs have been an effective tool to implement water supply and water quality improvements as part of local and regional programs. While further streamlining may be valuable, we are concerned that if all grant programs are centralized, groundwater protection may be lost as a priority.

In closing, we would once again like to applaud your efforts toward streamlining state government. GRA intends to continue to participate in the process and make ourselves available to work with the Governor, the Legislature and other stakeholders to review and refine specific recommendations as they are presented.

Sincerely yours,



Timothy K. Parker, RG, CEG, CHG
Chair, Legislative Committee
Groundwater Resources Association of California

cc: GRA Board of Directors and Membership