



January 27, 2026

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**

**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 Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), a California-based network of regional climate collaboratives – each encompassing a diverse, multisector network of agencies and organizations working together to accelerate climate adaptation throughout their region.

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 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.

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.



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This exemption is particularly critical for Climate Resilience Centers (CRC) and Transformative Climate Communities (TCC) grantees who are positioned to receive implementation funding but face unnecessary administrative delays. CRC and TCC projects serve California's most vulnerable populations—communities that are disproportionately impacted by climate change and can least afford delays in receiving resources. These grantees have already undergone rigorous application and review processes. A full APA exemption would allow these shovel-ready projects to move forward without protracted administrative processes that hold up vital community infrastructure, green space development, climate adaptation measures, and emissions reduction initiatives.

For these reasons, we strongly support a full exemption from the APA for all Proposition 4 funding. Please do not hesitate to reach out to [admin@arccacalifornia.org](mailto:admin@arccacalifornia.org) if you would like to discuss any of our comments further or if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Darbi Berry".

Darbi Berry  
**San Diego Regional Climate Collaborative**

A handwritten signature in black ink that reads "Kaeleigh Reynolds".

Kaeleigh Reynolds  
**Sierra Climate Adaptation and Mitigation Partnership**

A handwritten signature in black ink that reads "Erin Coutts".

Erin Coutts, ARCCA 2025 Chair  
**Los Angeles Regional Collaborative for Climate Action & Sustainability**

A handwritten signature in black ink that reads "Casandre Esteve".

Casandre Esteve  
**Bay Area Climate Adaptation Network**

A handwritten signature in black ink that reads "Em Johnson".

Em Johnson, ARCCA 2025 Vice Chair  
**Central Coast Climate Collaborative**



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