



SIERRA CLUB
CALIFORNIA

**Testimony of Bill Allayaud, State Director, Sierra Club California before
the Little Hoover Commission regarding the Governor's Reorganization
Plan 1 (GRP 1) of 2005.**

Thank you for the opportunity to address the Commission on this important manner. These are Sierra Club California's written comments to support my oral testimony of 1/26/05. My oral testimony will parallel this letter, but will not be verbatim given the time constraints. My testimony I will also be on behalf of the Planning and Conservation League, the Natural Resources Defense Council, and Defenders of Wildlife. I note that these and other environmental organizations will submit their own written comments on the proposed plan.

The major theme of GRP 1 (and CPR) is to "improve productivity and accountability of state government" (GRP 1, page 1). We are also in favor of finding more efficient ways for our state agencies to exercise their responsibilities because that can mean more efficient environmental protection. And, we certainly favor accountability. However, we were very concerned that this theme has been played out in the CPR process with a bias towards the private sector and those who seek permits to discharge pollutants into our air and water and onto our land. After the Governor submitted GRP 1, we were dismayed to read that he believes that "...we [should] feed the private sector and starve the public sector" (Interview with Sacramento Bee, 1/18/2005). But, it is therefore not surprising that GRP 1 perpetrates the bias that CPR has, as explained below.

We believe that the CPR and GRP 1 lack focus on the *public* as the "customer", that is, the average citizen who pays taxes, but who also wants clean air and water. We believe that GRP1 and CPR missed the primary question that should be asked when undertaking a reorganization of state government -- *would the reorganization improve the state's ability to protect our public health and environment?* Put another way, what is the ultimate goal that the GRP is managing towards?

If the ultimate management goal is centralization of power in a government that costs less to run, we fear that the capacity of state government to manage complex natural resource issues will be diminished by these recommended actions, as will opportunities for public participation. Taking away from the public process will strengthen the lobbying power of special interests while reducing accountability and open government. This would put the quality of California's environment and its spectacular natural resources at serious risk and be the antithesis of what the GRP professes to do, that is, to increase accountability.

We also think that CPR and the GRP failed to establish the metric that will be used to measure progress toward achieving this management goal. If "success" is measured by money saved and positions cut, without regard to how that affects the performance of government agencies, we believe that the outcome will be detrimental to public health and the environment. If "success" is to be measured by positive environmental outcomes, we face the substantive challenge of defining what those desired outcomes are. This analysis is also absent from the both GRP 1 and the CPR report.





There is also a serious concern that the elimination of these boards and commissions will not save the taxpayers money. Most members of these entities are paid on a per diem basis. A major shortcoming of the GRP 1 is that it does not contain an analysis of the fiscal efficiency that would be achieved.

The overarching management goal of GRP 1 and CPR appears to be a dramatic shift from the current, decentralized board and commission structure to a centralized decision making structure along the lines of the federal government. Elimination of boards and commissions centralizes power, replaces board members and commissioners who have expertise and real-world experience with government bureaucrats, and removes opportunities for public participation. In general, we believe that this is the wrong direction to go if the goal is to protect California's environment. This would in fact follow the federal government model, where litigation is proliferated as frustrated members of the public try to extract information from decision-makers buried deep in the bowels of the bureaucracy.

Taking just one example of a board that we believe should be retained, the Board of Forestry and Fire Protection will illustrate our concerns. First, this recommendation for elimination was made without gathering any input from the staff of the Board of Forestry, from members of that Board, or from environmental organizations who appear before the Board on a regular basis. The GRP 1 contains no analysis, no breakdown of cost savings, and maybe most importantly, no description of how the authorities and responsibilities of the Board will be "absorbed" into the Department. In fact, since the Board members are only paid per diem and for travel, it is our opinion that little if any cost savings will be realized from eliminating the Board. The cost of the likely additional staff that will assume the functions of the Board could more than offset any "savings."

We do not think the composition of the Board is perfect and we do not always agree with their decisions; nonetheless, we greatly value our ability to attend their public hearings and make our concerns known. These hearings make the process "transparent" and provide "accountability" in state government. The Bagley-Keene Open Meeting Act helps the public access its government; Board functions assumed by agency staff will not be subject to this important statute. Putting the functions into the state bureaucracy is simply not good customer (public) service.

We will be submitting more extensive comments in writing that address the various boards and commissions slated for elimination by GRP 1. Thank you for the opportunity to address the Commission.

Bill Allayaud, State Legislative Director
Sierra Club California
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