



## Tri-TAC

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League of California Cities  
California Association of Sanitation Agencies  
California Water Environment Association

April 13, 2012

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*Via Electronic Mail*

Charles R. Hoppin, Chair & Members  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



SUBJECT: COMMENT LETTER: AGENDA ITEM 5 (RESOURCE ALIGNMENT)  
APRIL 17, 2012 BOARD MEETING

Dear Chairman Hoppin & Members of the Board:

The California Association of Sanitation Agencies (“CASA”) and Tri-TAC appreciate the opportunity to provide comments on the draft Resource Alignment Evaluation Report (“Draft Report”). CASA and Tri-TAC are statewide organizations comprised of members from public agencies and other professionals responsible for wastewater treatment. Our associations have been active in the State Water Resources Control Boards’ (“State Water Board”) strategic planning and fee stakeholder processes.

We applaud the State Water Board for its interest in assessing and aligning priorities and resources with specific performance targets and identifying opportunities for cost savings. (Resolution 2011-0052.) However, we are concerned about the very short opportunity (two and a half days) to review and digest the detailed information in this significant 51 page Draft Report. We understand that this Draft Report will serve as the foundation for the next step toward implementing any realignment or programmatic changes. Given that the State Water Board is not scheduled to take action on the report at this time, we request additional time to more thoroughly review the Draft Report and provide specific comments to the Board.

Based on our initial review, we do appreciate the detailed information provided in the Draft Report regarding current fee revenues, sources and expenditures. The Draft Report appears to do a good job of showing where program funding comes from and how

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it is spent within the core regulatory program. While we understand the need for some flexibility in resource allocation, we caution against moving in the direction of a WDPF “general fund” through which fee payers in one category are subsidizing the workload associated with another, an idea mentioned in the Draft Report. (Draft Report, p. 36) Fees that pay for services other than those provided directly to the fee payer, are constitutionally constrained. (Legislative Analyst’s Analysis of Proposition 26, July 15, 2010.)

We believe the next phase under the workplan prepared by staff to implement the Resolution adopted by your Board last fall will be to identify specific areas where greater efficiencies and cost savings can be achieved. This would seem the appropriate time to involve stakeholders in the process, and CASA and Tri-TAC are willing and able to participate in the process.

Sincerely,



Roberta L. Larson  
Director, Legal and Regulatory Affairs  
CASA



Terrie Mitchell  
Chair  
Tri-TAC

RLL/mb  
TM/mb