



California Special
Districts Association
Districts Stronger Together

December 15, 2014



Ms. Felicia Marcus
Chair, State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Draft Safe Drinking Water Plan for California

Dear Chair Marcus:

Thank you for the opportunity to comment on the State Water Resources Control Board's Draft Safe Drinking Water Plan for California. The California Special Districts Association (CSDA) proposes an amendment to Draft Recommendation 8-5 of the plan.

Current Draft Recommendation 8-5

The State Water Board recommends the enactment of legislation to mandate a small public water system, which is within the sphere of influence of a large water system, be required to annex to the larger system. Any legal or financial barriers to such consolidations should be addressed and funding options to facilitate consolidation should be made available such as through changes to the SDWSRF and/or future water bonds.

Proposed Amendment to Draft Recommendation 8-5

The State Water Board recommends the enactment of legislation to ~~mandate~~ *encourage* a small public water system, which is within the sphere of influence of a large water system, ~~be required~~ to annex to the larger system *when appropriate*. Any legal or financial barriers to such consolidations should be addressed and funding options to facilitate consolidation should be made available such as through changes to the SDWSRF and/or future water bonds.

CSDA understands and shares the desire to promote quality water service in disadvantaged communities. A generic bias of consolidation under any circumstances simply leads to bigger and bigger bureaucracies, rather than efficiency, effectiveness and responsiveness to local voters.

Consolidation of local agencies, when supported by local voters, is an important tool that in appropriate instances can increase efficiencies and effectiveness. Often the biggest obstacles to agencies achieving such consolidations can be the risks and costs involved for their new and/or existing constituents—some of which are manufactured or perpetuated by the state. Ultimately, the residents receiving a local service and paying for the service should choose the service. CSDA respects and values the role of the public in self-determining the local government entities that deliver its services.

For these reasons, CSDA must respectfully request that you consider these principles and amend Draft Recommendation 8-5 to encourage consolidation through proper incentives rather than through state mandate. Please contact me if you have any questions regarding our position.

Sincerely,

Jimmy MacDonald
Associate Legislative Representative

California Special Districts Association

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