



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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Via Electronic Mail

December 7, 2012

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Re: Comments on Agenda Item 82 for December 13, 2012 Hearing -
CASA's Petition to Amend Regulation 18705.5(c)

Dear Ms. Brar:

The California Association of Sanitation Agencies ("CASA") submits this letter to the Fair Political Practices Commission ("Commission") in support of our proposed amendment to Regulation 18705.3(c).

As stated in our Petition to Amend Regulation 18705.5(c), we understand that the Commission has determined that the March 2012 amendments to Regulation 18705.5(c) created a distinction between a public official's participation in the decision on his or her appointment to an outside agency as required by law, and the official's participation in a decision on his or her appointment to an internal ad hoc or standing committee of the official's own agency. Regulation 18705.5(c) allows the former and protects the public from potential abuses with the inclusion of online reporting requirements. Amending Regulation 18705.5(c) to explicitly permit the participation of public officials in appointments to internal ad hoc and standing committees will allow CASA's member agencies to staff their standing and ad hoc committees without the need to pass an ordinance every time an appointment is necessary. The online reporting requirements in subdivision (c)(3) will similarly protect the public from any potential abuses in addition to many of the member agencies' own statutory limits on compensation for participation in committee meetings. For the reasons stated in our Petition, we believe that the language in proposed amendment accomplishes this objective.

We also appreciate the Commission's efforts to act on our Petition during the December meeting. The Commission's decision will resolve any uncertainty for CASA's member agencies under the current regulation before many of the agencies begin appointing board members to their standing and ad hoc committees.

Very truly yours,

Roberta L. Larson
Executive Director

RLL:jm

cc: Theresa A. Dunham, Somach Simmons & Dunn