



March 12, 2025

Mr. David Burhenn
Burhenn & Gest, LLP
12401 Wilshire Blvd, Suite 200
Los Angeles, CA 90025

Ms. Anne Kato
State Controller's Office
Local Government Programs and
Services Division
3301 C Street, Suite 740
Sacramento, CA 95816

And Parties, Interested Parties, and Interested Persons (See Mailing List)

Re: Proposed Statewide Cost Estimate

California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033, 10-TC-07

California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033, Sections IV. A-C; VI.D.1.a.vii; VI.D.1.c.i(8); VI.D.2.c; VI.D.2.d.ii(d); VI.D.2.i; VII.B; VII.D.2; VIII.A; VIII.H; IX.C; IX.D; IX.H; X.D; XII.A.1; XII.B; XII.H; XIV.D; XV.A; XV.C; XV.F.1; XV.F.4; XV.F.5; XVII.A.3; and Appendix 3, Section III.E.3., Adopted January 29, 2010

Dear Mr. Burhenn and Ms. Kato:

The Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review.

Hearing: This matter is set for hearing on **Friday, March 28, 2025, in person at 10:00 a.m., at Park Tower, 980 9th Street, Second Floor Conference Room, Sacramento, California, 95814 and via Zoom.**

The Commission is committed to ensuring that its public meetings are accessible to the public and that the public has the opportunity to observe the meeting and to participate by providing written and verbal comment on Commission matters whether they are physically appearing at the in-person meeting location or participating via Zoom. If you want to speak during the hearing and you are in-person, please come to the table for the swearing in and to speak when your item is up for hearing. If you are participating via Zoom, you must use the "Raise Hand" feature in order for our moderators to know you need to be unmuted.

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1. Through the link below you can listen and view through your desktop, laptop, tablet, or smart phone. This will allow you to view documents being shared as well. **(You are encouraged to use this option.)**

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2. Through your landline, smart mobile, or non-smart mobile phone, either number works. You will be able to listen to the proceedings but will not be able to view the meeting or any documents being shared. If you would like to speak, press #2 to use the “Raise Hand” feature.

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Please don't hesitate to reach out to us for help with technical problems at csminfo@csm.ca.gov or 916 323-3562.

This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on consent and wish to testify at the hearing or have a representative testify on your behalf, and if other witnesses will appear.

In that case, please notify the Commission office not later than noon on the Tuesday prior to the hearing, March 25, 2025. Please also include the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking remotely to receive a hearing panelist link in Zoom. When calling or emailing, identify the item you want to testify on and the entity you represent. The Commission Chairperson reserves the right to impose time limits on presentations as may be necessary to complete the agenda.

If you plan to file any written document, please note that Commission staff will include written comments filed at least 15 days in advance of the hearing in the Commissioners' hearing binders, a copy of which is available for public viewing at the Commission meeting. Additionally, written comments filed more than five days in advance of the meeting shall be included in the Commission's meeting binders, if feasible, or shall be provided to the Commission when the item is called, unless otherwise agreed by the Commission or the executive director. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(A-B).)

However, comments filed less than five days in advance of the meeting, the commenter shall provide 12 copies to Commission staff at the in-person meeting. In the case of participation by teleconference, a PDF copy shall be filed via the <https://www.csm.ca.gov/dropbox.shtml> at least 24 hours prior to the hearing.

Commission staff shall provide copies of the comments to the Commission and shall place a copy on a table for public review when the item is called, or in the case of participation via teleconference, shall provide an electronic copy to the Commission and post a copy on the Commission's website, and may share the document with the Commission and the public using the “share screen” function. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(C).)

If you would like to request postponement of the hearing, please refer to section 1187.9(b) of the Commission's regulations.

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Special Accommodations

For any special accommodations such as a sign language interpreter, an assistive listening device, materials in an alternative format, or any other accommodations, please contact the Commission Office at least five to seven *working* days prior to the meeting.

Very truly yours,



Juliana F. Gmur
Executive Director

ITEM 4
PROPOSED STATEWIDE COST ESTIMATE

\$1,787,743 - \$2,784,272
Claim Period¹

(January 29, 2010 to December 31, 2017)

California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033, Sections IV. A-C; VI.D.1.a.vii; VI.D.1.c.i(8); VI.D.2.c; VI.D.2.d.ii(d); VI.D.2.i; VII.B; VII.D.2; VIII.A; VIII.H; IX.C; IX.D; IX.H; X.D; XII.A.1; XII.B; XII.H; XIV.D; XV.A; XV.C; XV.F.1; XV.F.4; XV.F.5; XVII.A.3; and Appendix 3, Section III.E.3.

10-TC-07

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on March 28, 2025 as follows:

Member	Vote
Lee Adams, County Supervisor	
Deborah Gallegos, Representative of the State Controller, Vice Chairperson	
Karen Greene Ross, Public Member	
Renee Nash, School District Board Member	
William Pahland, Representative of the State Treasurer	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	
Matt Read, Representative of the Director of the Office of Land Use and Climate Innovation	

¹ The entire reimbursement period is within the initial claim period because the Commission found the mandate is not reimbursable beginning January 1, 2018 due to the claimants' fee authority, sufficient as a matter of law, to pay for the reimbursable activities pursuant to Government Code section 17556(d). See Exhibit A, Decision and Parameters and Guidelines, pages 11-12.

STAFF ANALYSIS

Summary of the Mandate, Eligible Claimants, and Period of Reimbursement

This Statewide Cost Estimate addresses state-mandated activities arising from National Pollutant Discharge Elimination System (NPDES) Order No. R8-2010-0033, adopted by the Santa Ana Regional Water Quality Control Board on January 29, 2010.

The Commission adopted the Test Claim Decision on March 22, 2024,² and the Decision and Parameters and Guidelines on May 24, 2024,³ partially approving reimbursement for the County of Riverside,⁴ and the cities of Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, and Wildomar.⁵

The initial reimbursement period, which is also the entire reimbursement period, is January 29, 2010 to December 31, 2017 (except reimbursement for the cities of Murrieta and Wildomar ended on June 6, 2013).⁶ Eligible claimants were required to file initial claims with the State Controller's Office (Controller) by January 20, 2025. Late initial reimbursement claims may be filed until January 20, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.⁷

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

A. Local Implementation Plans (LIPs)

1. Within six months of adoption of the test claim permit, the permittees shall develop a LIP template and submit for approval of the executive officer. The LIP template shall be amended as the provisions of the Drainage Area Management Plan (DAMP) are amended to address the requirements of the test claim permit. The LIP template shall facilitate a description of the co-permittee's individual programs to implement the DAMP, including the organizational units responsible for implementation and identify positions responsible for urban runoff program implementation. The description shall specifically address the items enumerated

² Exhibit C (1), Test Claim Decision, page 198 (Test Claim Permit).

³ Exhibit A, Decision and Parameters and Guidelines.

⁴ The Test Claim was denied as to the Riverside County Flood Control and Water Conservation District because there was no evidence the District incurred costs mandated by the state from its proceeds of taxes, so it is not an eligible claimant. Exhibit A, Decision and Parameters and Guidelines, pages 8, 17.

⁵ Exhibit A, Decision and Parameters and Guidelines, pages 17-18.

⁶ Exhibit C (1), Test Claim Decision, pages 49-50. The Commission found that "The Cities of Murrieta and Wildomar are eligible claimants under the test claim permit (R8-2010-0033) whose potential period of reimbursement ends June 6, 2013."

⁷ Government Code section 17561(d)(3).

in Sections IV.A.1 through IV.A.12 of the test claim permit (Order No. R8-2010-0033, Section IV.A).

2. Within 12 months of approval of the LIP template, and amendments thereof, by the executive officer, each permittee shall complete a LIP, in conformance with the LIP template. The LIP shall be signed by the principal executive officer or ranking elected official or their duly authorized representative pursuant to Section XX.M of the test claim permit (Order No. R8-2010-0033, Section IV.B).
3. Revise the LIP as necessary, following an annual review and evaluation of the effectiveness of the urban runoff programs, in compliance with Section VIII.H of the test claim permit (Order No. R8-2010-0033, Section IV.C).
4. Middle Santa Ana River permittees (Riverside County and the Cities of Corona, Norco, and Riverside) shall amend the LIP to be consistent with the revised DAMP and WQMPs to comply with the interim WQBELs for the Middle Santa Ana River Watershed Bacterial Indicator TMDL within 90 days after said revisions are approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.1.a.vii).
5. Middle Santa Ana River permittees (Riverside County and the Cities of Corona, Norco, and Riverside) shall revise the LIPs consistent with the Comprehensive Bacteria Reduction Plan (CBRP) to comply with the final WQBELs during the dry season for the Middle Santa Ana River Watershed Bacterial Indicator TMDL no more than 180 days after the CBRP is approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.1.c.i(8)).
6. Lake Elsinore/Canyon Lake permittees (Riverside County Flood Control and Water Conservation District, County of Riverside and Cities of Beaumont, Canyon Lake, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Perris, San Jacinto, Riverside, and Wildomar) shall revise the LIPs as necessary to implement the interim WQBEL compliance plans (Lake Elsinore In-Lake Sediment Nutrient Reduction Plan, Lake Elsinore/Canyon Lake Model Update Plan) to comply with nutrient TMDLs for the Lake Elsinore/Canyon Lake (San Jacinto Watershed) submitted pursuant to Section VI.D.2.a and b of the test claim permit (Order No. R8-2010-0033, Section VI.D.2.c).
7. Lake Elsinore/Canyon Lake Permittees (Riverside County Flood Control and Water Conservation District, County of Riverside and Cities of Beaumont, Canyon Lake, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Perris, San Jacinto, Riverside, and Wildomar) shall revise the LIPs consistent with the Comprehensive Nutrient Reduction Plan (CNRP), which describes in detail the specific actions that have been taken or will be taken, including the proposed method for evaluating progress, to achieve final compliance with the WQBELs for the nutrients TMDL in the San Jacinto Watershed, no more than 180 days after the CNRP is approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.2.d.ii(d)).
8. Lake Elsinore/Canyon Lake Permittees (Riverside County Flood Control and Water Conservation District, County of Riverside and Cities of Beaumont,

Canyon Lake, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Perris, San Jacinto, Riverside, and Wildomar) shall revise the LIPs as necessary to implement the CNRP to comply with the final WQBELs for the nutrients TMDL in the San Jacinto Watershed, including any necessary revisions resulting from updates to the CNRP following a BMP effectiveness analysis as required by Section VI.D.2.f of the test claim permit (Order No. R8-2010-0033, Section VI.D.2.i).

9. The LIPs must be designed to achieve compliance with receiving water limitations associated with discharges of urban runoff to the MEP (Order No. R8-2010-0033, Section VII.B).
10. Within 30 days following approval by the executive officer of the report described in Section VII.D.1 of the test claim permit, the permittees shall revise the applicable LIPs to incorporate the approved modified BMPs that have been and will be implemented, the implementation schedule, and any additional monitoring required (Order No. R8-2010-0033, Section VII.D.2).
11. The permittees shall incorporate their enforcement programs into the LIPs (Order No. R8-2010-0033, Section VIII.A).
12. The permittees shall update the LIPs following an annual evaluation of the effectiveness of implementation and enforcement response procedures with respect to the items discussed in Sections VIII.A through G of the test claim permit (Order No. R8-2010-0033, Section VIII.H).
13. The permittees shall describe their procedures and authorities for managing illegal dumping in the LIPs (Order No. R8-2010-0033, Section IX.C).
14. The permittees shall update the LIPs following their review of and revisions to their IC/ID programs to include a proactive IDDE program, as set forth in Section IX.D of the test claim permit (Order No. R8-2010-0033, Section IX.D).
15. Each co-permittee shall specify in its LIP its procedure for verifying that any map or permit for a new development or significant redevelopment project for which discretionary approval is sought has obtained coverage under the General Construction Permit, where applicable, and any tools utilized for this purpose (Order No. R8-2010-0033, Section XII.A.1).
16. Within 18 months of adoption of the test claim permit, each permittee shall include in its LIP standard procedures and tools pertaining to the following:
 - a. The process for review and approval of WQMPs, including a checklist that incorporates the minimum requirements of the model WQMP.
 - b. A database to track structural post-construction BMPs, consistent with Section XII.K.4 of the test claim permit.
 - c. Ensuring that the entity or entities responsible for BMP maintenance and the mechanism for BMP funding are identified prior to WQMP approval.

d. Training for those involved with WQMP reviews in accordance with Section XV of the test claim permit (Training Requirements) (Order No. R8-2010-0033, Section XII.H).

17. Each permittee shall include in its LIP the inspection and cleaning frequency for all portions of its MS4 (Order No. R8-2010-0033, Section XIV.D).

18. Within 24 months of adoption of the test claim permit, each permittee shall update their LIP to include a program to provide formal and where necessary, informal training to permittee staff that implement the provisions of the test claim permit (Order No. R8-2010-0033, Section XV.A).

B. Proactive Illicit Discharge Detection and Elimination Program

1. Within 18 months of adoption of this test claim permit, review and revise the IC/ID program to include a proactive illicit discharge detection and elimination program, using the Guidance Manual for Illicit Discharge Detection and Elimination by the Center for Watershed Protection or any other equivalent program, consistent with Section IX.E of the test claim permit (Order No. R8-2010-0033, Section IX.D).

2. Report the result of the review required by Section IX.D of the test claim permit in the annual report and include a description of the permittees' revised proactive illicit discharge detection and elimination program, procedures and schedules (Order No. R8-2010-0033, Section IX.D).

3. *Except* for those responses that result in an enforcement action, maintain a database summarizing IC/ID incident response, including IC/IDs detected as part of field monitoring activities (Order No. R8-2010-0033, Section IX.H).

4. Review and update the dry weather and wet weather reconnaissance strategies to identify and eliminate IC/IDs using the Guidance Manual for Illicit Discharge Detection and Elimination by the Center for Watershed Protection or any other equivalent program (Order No. R8-2010-0033, Appendix 3, Section III.E).

5. Establish a baseline dry weather flow concentration for total dissolved solids and total inorganic nitrogen at each core monitoring location using dry weather monitoring for nitrogen and total dissolved solids (Order No. R8-2010-0033, Appendix 3, Section III.E). *Monitoring for total dissolved solids and total inorganic nitrogen is not a new requirement and is not eligible for reimbursement.*

C. Septic System Database

1. The County of Riverside shall maintain updates to a database of new septic systems in the permittees' jurisdictions approved since 2008 (Order No. R8-2010-0033, Section X.D).

D. Watershed Action Plan

1. Within three years of adoption of the test claim permit, the permittees shall develop and submit to the Executive Officer for approval a Watershed Action Plan and implementation tools that describes and implements the permittees' approach to coordinated watershed management (Order No. R8-2010-0033,

Sections XII.B.1, 2, and 3). At a minimum, the Watershed Action Plan shall include the following:

- a. Description of proposed regional BMP approaches that will be used to address urban TMDL WLAs.
 - b. Development of recommendations for specific retrofit studies of MS4, parks and recreational areas that incorporate opportunities for addressing TMDL implementation plans, hydromodification from urban runoff and LID implementation.
 - c. Description of regional efforts that benefit water quality (e.g. Western Riverside County Multiple Species Habitat Conservation Plan, TMDL Task Forces, Water Conservation Task Forces, Integrated Regional Watershed Management Plans) and their role in the Watershed Action Plan. The permittees shall describe how these efforts link to their urban runoff programs and identify any further coordination that should be promoted to address urban WLA or hydromodification from urban runoff to the MEP (Section XII.B.3).
2. Within two years of adoption of the test claim permit, the permittees shall delineate existing unarmored or soft-armored stream channels in the permit area that are vulnerable to hydromodification from new development and significant redevelopment projects (Order No. R8-2010-0033, Section XII.B.4).
 3. Within two years of completion of the channel delineation in Section XII.B.4 of the test claim permit, develop a Hydromodification Management Plan (HMP) describing how the delineation will be used on a per project, sub-watershed, and watershed basis to manage Hydromodification caused by urban runoff. The HMP shall prioritize actions based on drainage feature/susceptibility/risk assessments and opportunities for restoration.
 - a. The HMP shall identify potential causes of identified stream degradation including a consideration of sediment yield and balance on a watershed or subwatershed basis.
 - b. Develop and implement a HMP to evaluate Hydromodification impacts for the drainage channels deemed most susceptible to degradation. The HMP will identify sites to be monitored, include an assessment methodology, and required follow-up actions based on monitoring results. Where applicable, monitoring sites may be used to evaluate the effectiveness of BMPs in preventing or reducing impacts from Hydromodification (Order No. R8-2010-0033, Section XII.B.5).
 4. Identify impaired waters [CWA § 303(d) listed] with identified urban runoff pollutant sources causing impairment, existing monitoring programs addressing those pollutants, any BMPs that the permittees are currently implementing, and any BMPs the permittees are proposing to implement consistent with the other requirements of this Order. Upon completion of the channel delineation, develop a schedule to implement an integrated, world-wide-web available, regional

geodatabase of the impaired waters, MS4 facilities, critical habitat preserves defined in the Multiple Species Habitat Conservation Plan and stream channels in the permit area that are vulnerable to hydromodification from urban runoff (Order No. R8-2010-0033, Section XII.B.6).

5. Develop a schedule to maintain the watershed geodatabase and other available and relevant regulatory and technical documents associated with the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.7).
6. Within three years of adoption of the test claim permit, the permittees shall submit the Watershed Action Plan to the Executive Officer for approval and incorporation into the DAMP. Within six months of approval, each permittee shall implement applicable provisions of the approved revised DAMP and incorporate applicable provisions of the revised DAMP into the LIPs for watershed wide coordination of the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.8).
7. The permittees shall also incorporate Watershed Action Plan training, as appropriate, including training for upper-level managers and directors into the training programs described in Section XV of the test claim permit. The co-permittees shall also provide outreach and education to the development community regarding the availability and function of appropriate web-enabled components of the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.9).
8. Invite participation and comments from resource conservation districts, water and utility agencies, state and federal agencies, non-governmental agencies and other interested parties in the development and use of the watershed geodatabase (Order No. R8-2010-0033, Section XII.B.10).

E. Employee Training

1. Provide formal training to permittee employees responsible for implementing the requirements of the test claim order related to project-specific WQMP review on the following:
 - a. Review and approval of project-specific WQMPs
 - b. Potential effects that permittee or public activities related to the employee trainee's duties can have on water quality
 - c. Principal applicable water quality laws and regulations that are the basis for the requirements in the DAMP
 - d. Provisions of the DAMP that relate to the duties of the employee trainee, including an overview of the CEQA requirements contained in Section XII.C of the test claim permit (Order No. R8-2010-0033, Section XV.C).
2. Formal training (training conducted in classrooms or using videos, DVDs or other multimedia) shall: consider all applicable permittee staff responsible for implementing the requirements of the test claim order related to project-specific WQMP review (including but not limited to planners, plan reviewers, and

engineers); define the required knowledge and competencies for each permittee activity; outline the curriculum; include testing or other procedures to determine that the trainees have acquired the requisite knowledge to carry out their duties, and provide proof of completion of training such as certificate of completion, and/or attendance sheets (Order No. R8-2010-0033, Section XV.C).

3. New Permittee employees responsible for implementing requirements of the test claim permit relating to project-specific WQMP review must receive formal training within one year of hire (Order No. R8-2010-0033, Section XV.F.1).
4. Existing permittee employees responsible for implementing the requirements of the test claim permit relating to project-specific WQMP review must receive formal training at least once during the term of the test claim permit (Order No. R8-2010-0033, Section XV.F.4).
5. Include the start date for formal training of permittee employees responsible for implementing the requirements of the test claim permit relating to project-specific WQMP review in the schedule of DAMP revisions required in Section III.A.1.s of the test claim permit, which shall be no later than six months after Executive Officer approval of DAMP updates applicable to the permittee activities described in Section XIV of the test claim permit (Order No. R8-2010-0033, Section XV.F.5).

F. Urban Runoff Management Program Effectiveness Assessment

1. Develop and include in the first annual report (November 2010) after the adoption of the test claim permit a proposal for assessment of urban runoff management program effectiveness on an area-wide and jurisdiction-specific basis at the six outcome levels, utilizing the California Storm Water Quality Association (CASQA) Municipal Storm Water Program Effectiveness Assessment Guidance. The assessment measures are required to target both water quality outcomes and the results of municipal enforcement activities, consistent with the requirements of Appendix 3, Section IV.B (Order No. R8-2010-0033, Section XVII.A.3).

Offsetting Revenues and Reimbursements

The Parameters and Guidelines specify any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.⁸

⁸ Exhibit A, Decision and Parameters and Guidelines, page 16.

Statewide Cost Estimate

Staff reviewed 54 unaudited reimbursement claims submitted by 10 municipal claimants (of the 15 eligible claimants), as compiled by the Controller. Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein.

Table 1. Reimbursement Period Cost Estimate

<p>Activity A.1. Within six months of adoption of the test claim permit, the permittees shall develop a LIP template and submit it for approval of the executive officer. The LIP template shall be amended as the provisions of the Drainage Area Management Plan (DAMP) are amended to address the requirements of the test claim permit. The LIP template shall facilitate a description of the co-permittee's individual programs to implement the DAMP, including the organizational units responsible for implementation and identify positions responsible for urban runoff program implementation. The description shall specifically address the items enumerated in Sections IV.A.1 through IV.A.12 of the test claim permit (Order No. R8-2010-0033, Section IV.A).</p>	<p>\$37,833 - \$52,966</p>
<p>Activity A.2. Within 12 months of approval of the LIP template, and amendments thereof, by the executive officer, each permittee shall complete a LIP, in conformance with the LIP template. The LIP shall be signed by the principal executive officer or ranking elected official or their duly authorized representative pursuant to Section XX.M of the test claim permit (Order No. R8-2010-0033, Section IV.B).</p>	<p>\$10,237 - \$51,185</p>
<p>Activity A.3. Revise the LIP as necessary, following an annual review and evaluation of the effectiveness of the urban runoff programs, in compliance with Section VIII.H of the test claim permit (Order No. R8-2010-0033, Section IV.C).</p>	<p>\$35,264 - \$70,528</p>
<p>Activity A.4. Middle Santa Ana River permittees (Riverside County and the Cities of Corona, Norco, and Riverside) shall amend the LIP to be consistent with the revised DAMP and WQMPs to comply with the interim WQBELs for the Middle Santa Ana River Watershed Bacterial Indicator TMDL within 90 days after said revisions are approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.1.a.vii).</p>	<p>\$0 - \$0</p>
<p>Activity A.5. Middle Santa Ana River permittees shall revise the LIPs consistent with the Comprehensive Bacteria Reduction Plan (CBRP) to comply with the final WQBELs during the dry season for the Middle Santa Ana</p>	<p>\$0 - \$0</p>

River Watershed Bacterial Indicator TMDL no more than 180 days after the CBRP is approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.1.c.i(8)).	
Activity A.6. Lake Elsinore/Canyon Lake permittees (Riverside County Flood Control and Water Conservation District, County of Riverside and Cities of Beaumont, Canyon Lake, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Perris, San Jacinto, Riverside, and Wildomar) shall revise the LIPs as necessary to implement the interim WQBEL compliance plans (Lake Elsinore In-Lake Sediment Nutrient Reduction Plan, Lake Elsinore/Canyon Lake Model Update Plan) to comply with nutrient TMDLs for the Lake Elsinore/Canyon Lake (San Jacinto Watershed) submitted pursuant to Section VI.D.2.a and b of the test claim permit (Order No. R8-2010-0033, Section VI.D.2.c).	\$0 - \$0
Activity A.7. Lake Elsinore/Canyon Lake Permittees shall revise the LIPs consistent with the Comprehensive Nutrient Reduction Plan (CNRP), which describes in detail the specific actions that have been taken or will be taken, including the proposed method for evaluating progress, to achieve final compliance with the WQBELs for the nutrients TMDL in the San Jacinto Watershed, no more than 180 days after the CNRP is approved by the Regional Board (Order No. R8-2010-0033, Section VI.D.2.d.ii(d)).	\$0 - \$0
Activity A.8. Lake Elsinore/Canyon Lake Permittees shall revise the LIPs as necessary to implement the CNRP to comply with the final WQBELs for the nutrients TMDL in the San Jacinto Watershed, including any necessary revisions resulting from updates to the CNRP following a BMP effectiveness analysis as required by Section VI.D.2.f of the test claim permit (Order No. R8-2010-0033, Section VI.D.2.i).	\$0 - \$0
Activity A.9. The LIPs must be designed to achieve compliance with receiving water limitations associated with discharges of urban runoff to the MEP (Order No. R8-2010-0033, Section VII.B).	\$0 - \$0
Activity A.10. Within 30 days following approval by the executive officer of the report described in Section VII.D.1 of the test claim permit, the permittees shall revise the applicable LIPs to incorporate the approved modified BMPs that have been and will be implemented, the implementation schedule, and any additional monitoring required (Order No. R8-2010-0033, Section VII.D.2).	\$0 - \$0

Activity A.11. The permittees shall incorporate their enforcement programs into the LIPs (Order No. R8-2010-0033, Section VIII.A).	\$11,946 - \$59,730
Activity A.12. The permittees shall update the LIPs following an annual evaluation of the effectiveness of implementation and enforcement response procedures with respect to the items discussed in Sections VIII.A through G of the test claim permit (Order No. R8-2010-0033, Section VIII.H).	\$0 - \$0
Activity A.13. The permittees shall describe their procedures and authorities for managing illegal dumping in the LIPs (Order No. R8-2010-0033, Section IX.C).	\$0 - \$0
Activity A.14. The permittees shall update the LIPs following their review of and revisions to their IC/ID programs to include a proactive IDDE program, as set forth in Section IX.D of the test claim permit (Order No. R8-2010-0033, Section IX.D).	\$9,938 - \$49,690
Activity A.15. Each co-permittee shall specify in its LIP its procedure for verifying that any map or permit for a new development or significant redevelopment project for which discretionary approval is sought has obtained coverage under the General Construction Permit, where applicable, and any tools utilized for this purpose (Order No. R8-2010-0033, Section XII.A.1).	\$0 - \$0
Activity A.16. Within 18 months of adoption of the test claim permit, each permittee shall include in its LIP standard procedures and tools pertaining to the following: <ul style="list-style-type: none"> a. The process for review and approval of WQMPs, including a checklist that incorporates the minimum requirements of the model WQMP. b. A database to track structural post-construction BMPs, consistent with Section XII.K.4 of the test claim permit. c. Ensuring that the entity or entities responsible for BMP maintenance and the mechanism for BMP funding are identified prior to WQMP approval. d. Training for those involved with WQMP reviews in accordance with Section XV of the test claim permit (Training Requirements) (Order No. R8-2010-0033, Section XII.H). 	\$4,315 - \$21,575
Activity A.17. Each permittee shall include in its LIP the inspection and cleaning frequency for all portions of its MS4 (Order No. R8-2010-0033, Section XIV.D).	\$40,713 - \$203,565
Activity A.18. Within 24 months of adoption of the test claim permit, each permittee shall update their LIP to include a program to provide formal and where	\$6,328 - \$31,640

necessary, informal training to permittee staff that implement the provisions of the test claim permit (Order No. R8-2010-0033, Section XV.A).	
Activity B.1. Within 18 months of adoption of this test claim permit, review and revise the IC/ID program to include a proactive illicit discharge detection and elimination program, using the Guidance Manual for Illicit Discharge Detection and Elimination by the Center for Watershed Protection or any other equivalent program, consistent with Section IX.E of the test claim permit (Order No. R8-2010-0033, Section IX.D).	\$40,635 - \$56,889
Activity B.2. Report the result of the review required by Section IX.D of the test claim permit in the annual report and include a description of the permittees' revised proactive illicit discharge detection and elimination program, procedures and schedules (Order No. R8-2010-0033, Section IX.D).	\$0 - \$0
Activity B.3. <i>Except</i> for those responses that result in an enforcement action, maintain a database summarizing IC/ID incident responses, including IC/IDs detected as part of field monitoring activities (Order No. R8-2010-0033, Section IX.H).	\$1,079 - \$5,395
Activity B.4. Review and update the dry weather and wet weather reconnaissance strategies to identify and eliminate IC/IDs using the Guidance Manual for Illicit Discharge Detection and Elimination by the Center for Watershed Protection or any other equivalent program (Order No. R8-2010-0033, Appendix 3, Section III.E).	\$0 - \$0
Activity B.5. Establish a baseline dry weather flow concentration for total dissolved solids and total inorganic nitrogen at each core monitoring location using dry weather monitoring for nitrogen and total dissolved solids (Order No. R8-2010-0033, Appendix 3, Section III.E). <i>Monitoring for total dissolved solids and total inorganic nitrogen is not eligible for reimbursement.</i>	\$12,322 - \$61,610
Activity C.1. The County of Riverside shall maintain updates to a database of new septic systems in the permittees' jurisdictions approved since 2008 (Order No. R8-2010-0033, Section X.D).	\$1,290 - \$1,290
Activity D.1. Within three years of adoption of the test claim permit, the permittees shall develop and submit to the Executive Officer for approval a Watershed Action Plan and implementation tools that describes and implements the permittees' approach to coordinated watershed management (Order No. R8-2010-0033,	\$33,471 - \$46,859

<p>Sections XII.B.1, 2, and 3). At a minimum, the Watershed Action Plan shall include the following:</p> <ul style="list-style-type: none"> a. Description of proposed regional BMP approaches that will be used to address urban TMDL WLAs. b. Development of recommendations for specific retrofit studies of MS4, parks and recreational areas that incorporate opportunities for addressing TMDL implementation plans, hydromodification from urban runoff and LID implementation. c. Description of regional efforts that benefit water quality (e.g. Western Riverside County Multiple Species Habitat Conservation Plan, TMDL Task Forces, Water Conservation Task Forces, Integrated Regional Watershed Management Plans) and their role in the Watershed Action Plan. The permittees shall describe how these efforts link to their urban runoff programs and identify any further coordination that should be promoted to address urban WLA or hydromodification from urban runoff to the MEP (Section XII.B.3). 	
<p>Activity D.2. Within two years of adoption of the test claim permit, the permittees shall delineate existing unarmored or soft-armored stream channels in the permit area that are vulnerable to hydromodification from new development and significant redevelopment projects (Order No. R8-2010-0033, Section XII.B.4).</p>	<p>\$28,025 - \$39,235</p>
<p>Activity D.3. Within two years of completion of the channel delineation in Section XII.B.4 of the test claim permit, develop a Hydromodification Management Plan (HMP) describing how the delineation will be used on a per project, sub-watershed, and watershed basis to manage Hydromodification caused by urban runoff. The HMP shall prioritize actions based on drainage feature/susceptibility/risk assessments and opportunities for restoration.</p> <ul style="list-style-type: none"> a. The HMP shall identify potential causes of identified stream degradation including a consideration of sediment yield and balance on a watershed or subwatershed basis. b. Develop and implement a HMP to evaluate Hydromodification impacts for the drainage channels deemed most susceptible to degradation. The HMP will identify sites to be monitored, include an assessment methodology, and required follow-up actions based on monitoring results. Where applicable, monitoring sites may be used to 	<p>\$30,890 - \$44,618</p>

evaluate the effectiveness of BMPs in preventing or reducing impacts from Hydromodification (Order No. R8-2010-0033, Section XII.B.5).	
Activity D.4. Identify impaired waters [CWA § 303(d) listed] with identified urban runoff pollutant sources causing impairment, existing monitoring programs addressing those pollutants, any BMPs that the permittees are currently implementing, and any BMPs the permittees are proposing to implement consistent with the other requirements of this Order. Upon completion of the channel delineation, develop a schedule to implement an integrated, world-wide-web available, regional geodatabase of the impaired waters, MS4 facilities, critical habitat preserves defined in the Multiple Species Habitat Conservation Plan and stream channels in the permit area that are vulnerable to hydromodification from urban runoff (Order No. R8-2010-0033, Section XII.B.6).	\$1,394,299 - \$1,952,019
Activity D.5. Develop a schedule to maintain the watershed geodatabase and other available and relevant regulatory and technical documents associated with the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.7).	\$0 - \$0
Activity D.6. Within three years of adoption of the test claim permit, the permittees shall submit the Watershed Action Plan to the Executive Officer for approval and incorporation into the DAMP. Within six months of approval, each permittee shall implement applicable provisions of the approved revised DAMP and incorporate applicable provisions of the revised DAMP into the LIPs for watershed wide coordination of the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.8).	\$0 - \$0
Activity D.7. The permittees shall also incorporate Watershed Action Plan training, as appropriate, including training for upper-level managers and directors into the training programs described in Section XV of the test claim permit. The co-permittees shall also provide outreach and education to the development community regarding the availability and function of appropriate web-enabled components of the Watershed Action Plan (Order No. R8-2010-0033, Section XII.B.9).	\$4,555 - \$6,579
Activity D.8. Invite participation and comments from resource conservation districts, water and utility agencies, state and federal agencies, non-governmental agencies and other interested parties in the development and use of the watershed geodatabase (Order No. R8-2010-0033, Section XII.B.10).	\$0 - \$0

<p>Activity E.1. Provide formal training to permittee employees responsible for implementing the requirements of the test claim order related to project-specific WQMP review on the following:</p> <ul style="list-style-type: none"> a. Review and approval of project-specific WQMPs b. Potential effects that permittee or public activities related to the employee trainee’s duties can have on water quality c. Principal applicable water quality laws and regulations that are the basis for the requirements in the DAMP d. Provisions of the DAMP that relate to the duties of the employee trainee, including an overview of the CEQA requirements contained in Section XII.C of the test claim permit (Order No. R8-2010-0033, Section XV.C). 	<p>\$63,877 - \$92,267</p>
<p>Activity E.2. Formal training (training conducted in classrooms or using videos, DVDs or other multimedia) shall: consider all applicable permittee staff responsible for implementing the requirements of the test claim order related to project-specific WQMP review (including but not limited to planners, plan reviewers, and engineers); define the required knowledge and competencies for each permittee activity; outline the curriculum; include testing or other procedures to determine that the trainees have acquired the requisite knowledge to carry out their duties, and provide proof of completion of training such as certificate of completion, and/or attendance sheets (Order No. R8-2010-0033, Section XV.C).</p>	<p>\$319 - \$1,595</p>
<p>Activity E.3. New Permittee employees responsible for implementing requirements of the test claim permit relating to project-specific WQMP review must receive formal training within one year of hire (Order No. R8-2010-0033, Section XV.F.1).</p>	<p>\$0 - \$0</p>
<p>Activity E.4. Existing permittee employees responsible for implementing the requirements of the test claim permit relating to project-specific WQMP review must receive formal training at least once during the term of the test claim permit (Order No. R8-2010-0033, Section XV.F.4).</p>	<p>\$3,761 - \$18,805</p>
<p>Activity E.5. Include the start date for formal training of permittee employees responsible for implementing the requirements of the test claim permit relating to project-specific WQMP review in the schedule of DAMP revisions required in Section III.A.1.s of the test claim permit, which shall be no later than six months after Executive Officer approval of DAMP updates applicable to the permittee</p>	<p>\$0 - \$0</p>

activities described in Section XIV of the test claim permit (Order No. R8-2010-0033, Section XV.F.5).	
Activity F.1. Develop and include in the first annual report (November 2010) after the adoption of the test claim permit a proposal for assessment of urban runoff management program effectiveness on an area-wide and jurisdiction-specific basis at the six outcome levels, utilizing the California Storm Water Quality Association (CASQA) Municipal Storm Water Program Effectiveness Assessment Guidance. The assessment measures are required to target both water quality outcomes and the results of municipal enforcement activities, consistent with the requirements of Appendix 3, Section IV.B (Order No. R8-2010-0033, Section XVII.A.3).	\$0 - \$0
Indirect Costs Identified	\$16,646 - \$26,957
Less Offsetting Revenues or Other Reimbursements	(\$0 - \$0)
Less a 10 Percent Late Filing Penalty from the High Estimate	(\$0 - \$110,725)
Total Costs	\$1,787,743 - \$2,784,272

Assumptions

1. Except for Activities A.3., A.12., A.15., B.3., C.1., D.7., E.1., E.2., and E.3., all of the activities approved for reimbursement are one-time activities and so most costs are expected to be claimed only in the first few years of reimbursement (except for the activities for which no initial claims were filed).
2. Ongoing costs for Activities A.3., A.12., A.15., B.3., C.1., D.7, E.1., E.2., and E.3., will continue to be claimed for the entire reimbursement period, ending December 31, 2017, except for Activity C.1. for which all costs are presumed claimed, and except for activities for which no claims were filed (see #7 below).
3. The amount claimed for the period of reimbursement may be higher if late or amended claims are filed. Only 10 of 15 eligible claimants (67 percent) filed initial claims for the reimbursement period.⁹ The remaining five eligible claimants (Beaumont, Canyon Lake, Lake Elsinore, Norco, Wildomar) may still file late claims, and the 10 claimants who timely filed may file amended claims for additional costs. As explained below, the five eligible claimants that have not filed claims are calculated as four in the estimates below because two claimants may only file claims for half of the period of reimbursement, or until June 6, 2013.
4. Wildomar and Murrieta can only claim until June 6, 2013, or half of the seven fiscal years in this claiming period (which is January 29, 2010 to December 31, 2017, consisting of about half of fiscal year 2009-2010, and fiscal

⁹ Exhibit C (2), Spreadsheet of Claims Data. The claimants that filed initial claims are the County of Riverside and the Cities of Calimesa, Corona, Hemet, Menifee, Moreno Valley, Murrieta, Perris, Riverside, San Jacinto.

years 2010-2011, 2011-2012, 2012-2013, 2013-2014, 2014-2015, 2015-2016, and half of 2016-2017). Thus, to calculate the high estimate, potential claims (assuming one filed annually) for the five non-filing eligible claimants are three non-filing claimants who can claim for the entire claiming period: ((3 claimants * 7 years = 21 claims) plus two non-filing claimants who can claim for half of the claiming period: (2 claimants * 3.5 years = 7 claims) = 28 potential claims). For simplicity, we average this to four non-filers (average of 4 claimants * 7 years = 28 potential claims).

5. Some of the claimants' costs are for contracted services because the permit designated the Riverside County Flood Control and Water Conservation District as the principal permittee,¹⁰ and the claimants paid the principal permittee for services under a cost sharing agreement.
6. In the Test Claim Decision, the Commission recognized the following potential offsetting revenue:

The County and cities have constitutional and statutory authority to charge property-related fees for the new state-mandated requirements related to Local Implementation Plans (Sections IV, VI.D.1.a.vii, VI.D.1.c.i(8), VI.D.2.c, VI.D.2.d.ii(d), VI.D.2.i, VII.B, VII.D.2, VIII.A, VIII.H, IX.C, IX.D, XII.A.1, XII.H, XIV.D, and XV.A); the proactive illicit discharge detection and elimination program (Sections IX.D, IX.E, IX.H, and Appendix 3, Section III.E.3); the septic system database (Section X.D); the Watershed Action Plan (Section XII.B); employee training (Sections XV.C, XV.F.1, XV.F.4, and XV.F.5), and urban runoff management program assessment (Section XVII.A.3).¹¹

However, no claimants identified offsetting revenues in their reimbursement claims, so the Commission estimates \$0 offsetting revenue.

7. If no claims were filed for a particular activity, the Commission assumes that no late or amended claims will be filed for that activity.
8. Costs may be lower if the Controller audits the claims and determines that other offsetting revenues (i.e., funds that are not the claimant's proceeds of taxes, including grant funds, or fee and assessment revenues) were used by a claimant to pay for the reimbursable activities.
9. Actual costs may be lower if the Controller reduces any reimbursement claim for this program following an audit deeming the claim to be excessive, unreasonable, or not eligible for reimbursement.

Methodology

For most activities, the low-end statewide cost estimates are only for the costs actually claimed. The high-end estimates (except C.1., and activities for which \$0 was claimed)

¹⁰ Exhibit C (1), Test Claim Decision, pages 39, 273-274.

¹¹ Exhibit C (1), Test Claim Decision, page 271,

assume all eligible claimants will claim reimbursement for the activity and represents the costs actually claimed plus the costs that could be claimed in late claims.

A. Reimbursement Period Cost Estimate

Activity A.1. requires the permittees to develop a LIP template and submit it for approval of the executive officer. The high estimate for activity A.1. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs actually claimed.

Activity A.1. actual costs claimed [\$37,833] / the number of filers [10] = average Activity A.1. cost per filer [\$3,783]

Average activity A.1. cost per filer [\$3,783] x number of non-filers [4]¹² = total estimated non-filer Activity A.1. costs [\$15,133]

Activity A.1. actual costs claimed [\$37,833] + estimated non-filer Activity A.1. costs that could be claimed in late claims [\$15,133] = Total potential Activity A.1. costs [\$52,966]

Activity A.2. requires each permittee to complete a LIP, in conformance with the LIP template. The high estimate for activity A.2. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.2. actual costs claimed [\$10,237] / the number of filers [1] = average Activity A.2. cost per filer [\$10,237]

Average activity A.2. cost per filer [\$10,237] x number of non-filers [4] = total estimated non-filer Activity A.2. costs [\$40,948]

Activity A.2. actual costs claimed [\$10,237] + estimated non-filer Activity A.2. costs that could be claimed in late claims [\$40,948] = Total potential Activity A.2. costs [\$51,185]

Activity A.3. requires revising the LIP as necessary following an annual review and evaluation of the effectiveness of the urban runoff programs. The high estimate for activity A.3. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.3. actual costs claimed [\$35,264] / the number of filers [4] = average Activity A.3. cost per filer [\$8,816]

Average activity A.3. cost per filer [\$8,816] x number of non-filers [4] = total estimated non-filer Activity A.3. costs [\$35,264]

¹² Although there were five non-filing municipalities, four is the average of three non-filing claimants and the two claimants only eligible to claim for half of the claiming period. See assumption #4 above.

Activity A.3. actual costs claimed [\$35,264] + estimated non-filer Activity A.3. costs that could be claimed in late claims [\$35,264] = Total potential Activity A.3. costs [\$70,528]

Activity A.4. requires the Middle Santa Ana River permittees to amend the LIP to be consistent with the revised DAMP and WQMPs. Because no initial claims were filed for activity A.4., which is a one-time activity, the Commission assumes none will be filed and estimates costs at \$0.

Activity A.5. requires the Middle Santa Ana River permittees to revise the LIPs consistent with the Comprehensive Bacteria Reduction Plan (CBRP) to comply with the final WQBELs. Because no initial claims were filed for activity A.5., a one-time activity, the Commission assumes none will be filed and estimates costs at \$0.

Activity A.6. requires the Lake Elsinore/Canyon Lake permittees to revise the LIPs as necessary to implement the interim WQBEL compliance plans. Because no initial claims were filed for activity A.6., a one-time activity, the Commission assumes none will be filed and estimates costs at \$0.

Activity A.7. requires the Lake Elsinore/Canyon Lake Permittees to revise the LIPs consistent with the Comprehensive Nutrient Reduction Plan (CNRP). Because no initial claims were filed for activity A.7., a one-time activity, the Commission assumes none will be filed and estimates costs at \$0.

Activity A.8. requires the Lake Elsinore/Canyon Lake Permittees to revise the LIPs as necessary to implement the CNRP. Because no initial claims were filed for activity A.8., a one-time activity, the Commission assumes none will be filed and estimates costs at \$0.

Activity A.9. states the LIPs must be designed to achieve compliance with receiving water limitations associated with discharges of urban runoff to the MEP. Because no initial claims were filed for activity A.9., the Commission assumes none will be filed and estimates costs at \$0.

Activity A.10. requires the permittees to revise the applicable LIPs to incorporate the approved modified BMPs. Because no initial claims were filed for activity A.10., the Commission assumes none will be filed and estimates costs at \$0.

Activity A.11. states the permittees shall incorporate their enforcement programs into the LIPs. The high estimate for activity A.11. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.11. actual costs claimed [\$11,946] / the number of filers [1] = average Activity A.11. cost per filer [\$11,946]

Average activity A.11. cost per filer [\$11,946] x number of non-filers [4] = total estimated non-filer Activity A.11. costs [\$47,784]

Activity A.11. actual costs claimed [\$11,946] + estimated non-filer Activity A.11. costs that could be claimed in late claims [\$47,784] = Total potential Activity A.11. costs [\$59,730]

Activity A.12. requires the permittees to update the LIPs following an annual evaluation. Because no initial claims were filed for activity A.12., the Commission assumes none will be filed and estimates costs at \$0.

Activity A.13. requires the permittees to describe their procedures and authorities for managing illegal dumping in the LIPs. Because no initial claims were filed for activity A.13., the Commission assumes none will be filed and estimates costs at \$0.

Activity A.14. requires the permittees to update the LIPs following their review of and revisions to their IC/ID programs. The high estimate for activity A.14. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.14. actual costs claimed [\$9,938] / the number of filers [1] = average Activity A.14. cost per filer [\$9,938]

Average activity A.14. cost per filer [\$9,938] x number of non-filers [4] = total estimated non-filer Activity A.14. costs [\$39,752]

Activity A.14. actual costs claimed [\$9,938] + estimated non-filer Activity A.14. costs that could be claimed in late claims [\$39,752] = Total potential Activity A.14. costs [\$49,690]

Activity A.15. requires each co-permittee to specify in its LIP its procedure for verifying coverage under the General Construction Permit. Because no initial claims were filed for activity A.15., the Commission assumes none will be filed and estimates costs at \$0.

Activity A.16. requires each permittee to include in its LIP standard procedures and tools pertaining to WQMPs. The high estimate for activity A.16. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.16. actual costs claimed [\$4,315] / the number of filers [1] = average Activity A.16. cost per filer [\$4,315]

Average activity A.16. cost per filer [\$4,315] x number of non-filers [4] = total estimated non-filer Activity A.16. costs [\$17,260]

Activity A.16. actual costs claimed [\$4,315] + estimated non-filer Activity A.16. costs that could be claimed in late claims [\$17,260] = Total potential Activity A.16. costs [\$21,575]

Activity A.17. requires each permittee to include in its LIP the inspection and cleaning frequency for all portions of its MS4. The high estimate for activity A.17. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.17. actual costs claimed [\$40,713] / the number of filers [1] = average Activity A.17. cost per filer [\$40,713]

Average activity A.17. cost per filer [\$40,713] x number of non-filers [4] = total estimated non-filer Activity A.17. costs [\$162,852]

Activity A.17. actual costs claimed [\$40,713] + estimated non-filer Activity A.17. costs that could be claimed in late claims [\$162,852] = Total potential Activity A.17. costs [\$203,565]

Activity A.18. requires each permittee to update their LIP to include a program to provide training to permittee staff. The high estimate for activity A.18. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity A.18. actual costs claimed [\$6,328] / the number of filers [1] = average Activity A.18. cost per filer [\$6,328]

Average activity A.18. cost per filer [\$6,328] x number of non-filers [4] = total estimated non-filer Activity A.18. costs [\$25,312]

Activity A.18. actual costs claimed [\$6,328] + estimated non-filer Activity A.18. costs that could be claimed in late claims [\$25,312] = Total potential Activity A.18. costs [\$31,640].

Activity B.1. requires reviewing and revising the IC/ID program to include a proactive illicit discharge detection and elimination program. The high estimate for activity B.1. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity B.1. actual costs claimed [\$40,635] / the number of filers [10] = average Activity B.1. cost per filer [\$4,064]

Average activity B.1. cost per filer [\$4,064] x number of non-filers [4] = total estimated non-filer Activity B.1. costs [\$16,254]

Activity B.1. actual costs claimed [\$40,635] + estimated non-filer Activity B.1. costs that could be claimed in late claims [\$16,254] = Total potential Activity B.1. costs [\$56,889].

Activity B.2. requires reporting the result of the review required by Section IX.D of the test claim permit in the annual report. Because no initial claims were filed for activity B.2., the Commission assumes none will be filed and estimates costs at \$0.

Activity B.3., except for those responses that result in an enforcement action, requires maintaining a database summarizing IC/ID incident responses. The high estimate for activity B.3. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity B.3. actual costs claimed [\$1,079] / the number of filers [1] = average Activity B.3. cost per filer [\$1,079]

Average activity B.3. cost per filer [\$1,079] x number of non-filers [4] = total estimated non-filer Activity B.3. costs [\$4,316]

Activity B.3. actual costs claimed [\$1,079] + estimated non-filer Activity B.3. costs that could be claimed in late claims [\$4,316] = Total potential Activity B.3. costs [\$5,395].

Activity B.4. requires reviewing and updating the dry weather and wet weather reconnaissance strategies. Because no initial claims were filed for activity B.4., the Commission assumes none will be filed and estimates costs at \$0.

Activity B.5. requires establishing a baseline dry weather flow concentration for total dissolved solids and total inorganic nitrogen. *Monitoring for total dissolved solids and total inorganic nitrogen is not eligible for reimbursement.* The high estimate for activity B.5. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity B.5. actual costs claimed [\$12,322] / the number of filers [1] = average Activity B.5. cost per filer [\$12,322]

Average activity B.5. cost per filer [\$12,322] x number of non-filers [4] = total estimated non-filer Activity B.5. costs [\$49,288]

Activity B.5. actual costs claimed [\$12,322] + estimated non-filer Activity B.5. costs that could be claimed in late claims [\$49,288] = Total potential Activity B.5. costs [\$61,610].

Activity C.1. requires the County of Riverside to maintain updates to a database of new septic systems in the permittees' jurisdictions approved since 2008. Because the County of Riverside is the sole eligible claimant for this activity, and the County filed initial reimbursement claims every fiscal year except for 2016-2017, the Commission assumes that all the claims for activity C.1. have been filed and estimates costs at actual costs claimed \$1,290.

Activity D.1. requires the permittees to develop and submit a Watershed Action Plan and implementation tools. The high estimate for activity D.1. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity D.1. actual costs claimed [\$33,471] / the number of filers [10] = average Activity D.1. cost per filer [\$3,347]

Average activity D.1. cost per filer [\$3,347] x number of non-filers [4] = total estimated non-filer Activity D.1. costs [\$13,388]

Activity D.1. actual costs claimed [\$33,471] + estimated non-filer Activity D.1. costs that could be claimed in late claims [\$13,388] = Total potential Activity D.1. costs [\$46,859].

Activity D.2. requires the permittees to delineate existing unarmored or soft-armored stream channels. The high estimate for activity D.2. is calculated by multiplying the average costs claimed by the [4] of eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity D.2. actual costs claimed [\$28,025] / the number of filers [10] = average Activity D.2. cost per filer [\$2,803]

Average activity D.2. cost per filer [\$2,803] x number of non-filers [4] = total estimated non-filer Activity D.2. costs [\$11,210]

Activity D.2. actual costs claimed [\$28,025] + estimated non-filer Activity D.2. costs that could be claimed in late claims [\$11,210] = Total potential Activity D.2. costs [\$39,235].

Activity D.3. requires developing a Hydromodification Management Plan (HMP). The high estimate for activity D.3. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity D.3. actual costs claimed [\$30,890] / the number of filers [9] = average Activity D.3. cost per filer [\$3,432]

Average activity D.3. cost per filer [\$3,432] x number of non-filers [4] = total estimated non-filer Activity D.3. costs [\$13,728]

Activity D.3. actual costs claimed [\$30,890] + estimated non-filer Activity D.3. costs that could be claimed in late claims [\$13,728] = Total potential Activity D.3. costs [\$44,618].

Activity D.4. requires identifying impaired waters with identified urban runoff pollutant sources, existing monitoring programs, and BMPs. The high estimate for activity D.4. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity D.4. actual costs claimed [\$1,394,299] / the number of filers [10] = average Activity D.4. cost per filer [\$139,430]

Average activity D.4. cost per filer [\$139,430] x number of non-filers [4] = total estimated non-filer Activity D.4. costs [\$557,720]

Activity D.4. actual costs claimed [\$1,394,299] + estimated non-filer Activity D.4. costs that could be claimed in late claims [\$557,720] = Total potential Activity D.4. costs [\$1,952,019].

Activity D.5. requires developing a schedule to maintain the watershed geodatabase. Because no initial claims were filed for activity D.5., the Commission assumes none will be filed and estimates costs at \$0.

Activity D.6. requires the permittees to submit the Watershed Action Plan to the Executive Officer for approval and incorporation into the DAMP. Because no initial claims were filed for activity D.6., the Commission assumes none will be filed and estimates costs at \$0.

Activity D.7. requires the permittees to also incorporate Watershed Action Plan training, into the training programs. The high estimate for activity D.7. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity D.7. actual costs claimed [\$4,555] / the number of filers [9] = average Activity D.7. cost per filer [\$506]

Average activity D.7. cost per filer [\$506] x number of non-filers [4] = total estimated non-filer Activity D.7. costs [\$2,024]

Activity D.7. actual costs claimed [\$4,555] + estimated non-filer Activity D.7. costs that could be claimed in late claims [\$2,024] = Total potential Activity D.7. costs [\$6,579].

Activity D.8. requires inviting participation and comments in the development and use of the watershed geodatabase. Because no initial claims were filed for activity D.8., the Commission assumes none will be filed and estimates costs at \$0.

Activity E.1. requires providing formal training to permittee employees related to project-specific WQMP review. The high estimate for activity E.1. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity E.1. actual costs claimed [\$63,877] / the number of filers [9] = average Activity E.1. cost per filer [\$7,097]

Average activity E.1. cost per filer [\$7,097] x number of non-filers [4] = total estimated non-filer Activity E.1. costs [\$28,390]

Activity E.1. actual costs claimed [\$63,877] + estimated non-filer Activity E.1. costs that could be claimed in late claims [\$28,390] = Total potential Activity E.1. costs [\$92,267].

Activity E.2. consists of formal training to: consider permittee staff responsible for implementing the requirements of project-specific WQMP review; define the required knowledge and competencies; outline the curriculum; include testing; and provide proof of completion of training. The high estimate for activity E.2. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity E.2. actual costs claimed [\$319] / the number of filers [1] = average Activity E.2. cost per filer [\$319]

Average activity E.2. cost per filer [\$319] x number of non-filers [4] = total estimated non-filer Activity E.2. costs [\$1,276]

Activity E.2. actual costs claimed [\$319] + estimated non-filer Activity E.2. costs that could be claimed in late claims [\$1,276] = Total potential Activity E.2. costs [\$1,595].

Activity E.3. requires new Permittee employees responsible for implementing requirements of project-specific WQMP review to receive formal training within one year of hire. Because there were no initial claimants for activity E.3., costs are assumed to be \$0.

Activity E.4. requires existing permittee employees responsible for implementing the requirements of the test claim permit relating to project-specific WQMP review to receive formal training at least once during the term of the test claim permit. The high estimate for activity E.4. is calculated by multiplying the average costs claimed by the [4] eligible claimants that have not yet filed claims and adding it to the costs claimed.

Activity E.4. actual costs claimed [\$3,761] / the number of filers [1] = average Activity E.4. cost per filer [\$3,761]

Average activity E.4. cost per filer [\$3,761] x number of non-filers [4] = total estimated non-filer Activity E.4. costs [\$15,044]

Activity E.4. actual costs claimed [\$3,761] + estimated non-filer Activity E.4. costs that could be claimed in late claims [\$15,044] = Total potential Activity E.4. costs [\$18,805].

Activity E.5. consists of including the start date for formal training of permittee employees responsible for implementing the requirements of project-specific WQMP review in the schedule of DAMP revisions. Because there were no initial claimants for activity E.5., costs are assumed to be zero.

Activity F.1. consists of developing and including in the first annual report (November 2010) after the adoption of the test claim permit a proposal for assessment of urban runoff management program effectiveness. Because there were no initial claimants for activity F.1., costs are assumed to be zero.

Indirect Costs: The low estimate for indirect costs is those indirect costs actually claimed. The high estimate, in addition to indirect costs actually claimed, assumes that all eligible claimants who have not yet filed claims will file claims for indirect costs at the same average rate actually claimed, which is calculated by dividing indirect costs claimed by direct costs claimed equals average indirect cost rate (as a percentage). Then multiply the average indirect cost rate by the estimated direct costs.

Indirect Costs Actually Claimed [\$16,646] / Direct Costs Actually Claimed [\$1,771,097] = Average Indirect Cost Rate [0.94%].

Indirect Cost Rate [0.94%] x Estimated Direct Costs (sum of all estimated non-filer activity costs for the initial claim period) [\$1,096,943] = [\$10,311] + Indirect Costs Actually Claimed [\$16,646] = High Estimated Indirect Costs [\$26,957].

Offsetting Revenues: The low estimate is \$0 because none of the initial claims compiled by the Controller reported offsetting revenues. The high estimate is also \$0 because there is no data upon which to make a projection.

Late Filing Penalties: The low estimate is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high estimate assumes that all non-filers will file claims for the initial period of reimbursement, which will be subject to a late filing penalty, and that penalty is calculated by adding non-filer direct and indirect costs and subtracting offsets to get non-filer net costs. Then, multiply the net costs by a ten percent late filing penalty to calculate estimated non-filer late filing penalties, which are added to the actual late-filing penalties (as reported) to estimate the high late filing penalties.

Estimated Non-filer Direct [\$1,096,943] and Indirect Costs [\$10,311] – Estimated Non-filer Offsets [\$0] = Estimated Non-filer Net Costs [\$1,107,254].

Estimated Non-filer Net Costs [\$1,107,254] x (10% late filing penalty) = Estimated Non-filer Late Filing Penalties [\$110,725].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties [\$110,725] = High Estimated Late Filing Penalties [\$110,725].

Draft Proposed Statewide Cost Estimate

On February 20, 2025, Commission staff issued the Draft Proposed Statewide Cost Estimate.¹³ No comments were filed on the Draft Proposed Statewide Cost Estimate.

Staff Recommendation

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$1,787,743 – \$2,784,272 for the Claim Period that began on January 29, 2010 and ended on December 31, 2017.

¹³ Exhibit B, Draft Proposed Statewide Cost Estimate.

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento, and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On March 12, 2025, I served the:

- **Current Mailing List dated March 7, 2025**
- **Proposed Statewide Cost Estimate issued March 12, 2025**

California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033, 10-TC-07

California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033, Sections IV. A-C; VI.D.1.a.vii; VI.D.1.c.i(8); VI.D.2.c; VI.D.2.d.ii(d); VI.D.2.i; VII.B; VII.D.2; VIII.A; VIII.H; IX.C; IX.D; IX.H; X.D; XII.A.1; XII.B; XII.H; XIV.D; XV.A; XV.C; XV.F.1; XV.F.4; XV.F.5; XVII.A.3; and Appendix 3, Section III.E.3., Adopted January 29, 2010

By making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on March 12, 2025, at Sacramento, California.



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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 3/7/25

Claim Number: 10-TC-07

Matter: California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2010-0033

Claimants: City of Beaumont
 City of Corona
 City of Hemet
 City of Lake Elsinore
 City of Moreno Valley
 City of Perris
 City of San Jacinto
 County of Riverside
 Riverside County Flood Control and Water Conservation District

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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