



March 23, 2026

Ms. Nora Frimann
City of San Jose
200 East Santa Clara
Street, 16th Floor
San Jose, CA 95113

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

Ms. Jennifer Maguire
City of San Jose
200 East Santa Clara Street
San Jose, CA 95113

Mr. Gregory Newmark
Duane Morris, LLP
865 South Figueroa
Street, Suite 3100
Los Angeles, CA 90017-
5450

Ms. Margaret Olaiya
County of Santa Clara
70 West Hedding Street, East
Wing, 2nd Floor
San Jose, CA 95110

Ms. Elizabeth Pianca
County of Santa Clara
70 West Hedding Street, East
Wing, 9th Floor
San Jose, CA 95110-1770

Ms. Colleen Tribby
City of Dublin
100 Civic Plaza
Dublin, CA 94568

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

Re: Proposed Statewide Cost Estimate

*California Regional Water Quality Control Board, San Francisco Region, Order
No. R2-2009-0074, 10-TC-02, 10-TC-03, and 10-TC-05*

*California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2009-0074, Sections C.8.d.iii., C.8.e.vi., C.8.f., C.8.g.ii., C.8.g.vii.,
C.10.a.i., C.10.a.ii., C.10.a.iii., C.10.b.ii., C.10.b.iii., C.10.c., C.10.d.i., C.10.d.ii.,
C.11.f., and C.12.f.; Adopted October 14, 2009, and Effective December 1, 2009*

Dear Ms. Frimann, Ms. Kato, Ms. Maguire, Mr. Newmark, Ms. Olaiya, Ms. Pianca, and
Ms. Tribby:

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

Hearing: This matter is set for hearing on **Friday, April 10, 2026, at 10:00 a.m., at
California Department of Food and Agriculture (CDFA), First Floor Auditorium,
1220 N Street, 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.

Ms. Frimann, Ms. Kato, Ms. Maguire, Mr. Newmark, Ms. Olaiya, Ms. Pianca, and Ms. Tribby

March 23, 2026

Page 2

You may join the meeting via Zoom through the link below and can listen and view through your desktop, laptop, tablet, or smart phone. This will allow you to view documents being shared as well.

There are three options for joining the meeting via Zoom:

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

[https://csm-ca-gov.zoom.us/j/88986511013?pwd=yjk4vUbelzOVIMWuVeBVfwFpp3bCO3.1](https://csm-ca.gov.zoom.us/j/88986511013?pwd=yjk4vUbelzOVIMWuVeBVfwFpp3bCO3.1)

Passcode: 041026

2. Through one tap mobile on an iPhone in the US. This process will dial everything for you without having to key in the meeting ID number. If you have the Zoom application on your iPhone you can view the meeting and documents being shared as well.

+1408-961-3928,,88986511013#,,,,*041026# US

+1408-961-3929,,88986511013#,,,,*041026# US

3. Through your landline 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.

+1 408 961 3927 +1 408 961-3928 +1 408 961-3929 US Toll

+1 855 758 1310 US Toll-free

Webinar ID: 889 8651 1013

Passcode: 041026

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

Testimony at the Commission Hearing: In that case, please notify Commission staff not later than noon on the Tuesday prior to the hearing, on April 7, 2026. 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 both in person and 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.

Time to File Written Comments: 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,

Ms. Frimann, Ms. Kato, Ms. Maguire, Mr. Newmark, Ms. Olaiya, Ms. Pianca, and Ms. Tribby
March 23, 2026
Page 3

unless otherwise agreed by the Commission or the executive director. (Cal. Code Regs., tit. 2, § § 1181.3 and 1181.10(b)(1)(A-B).

However, written comments filed less than five days in advance of the meeting, the commenter shall electronically file (or e-file) a PDF copy with the Commission via the Commission's e-filing system, available on the Commission's website <https://www.csm.ca.gov/dropbox.shtml> at least 24 hours prior to the meeting.

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" function. (Cal. Code Regs., tit. 2, § § 1181.3 and 1181.10(b)(1)(C)).

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

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

Hearing Date: April 10, 2026

ITEM 6
PROPOSED STATEWIDE COST ESTIMATE

\$6,840,647 – \$17,082,345
Initial Claim Period¹

(December 1, 2009, through December 31, 2017)

California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2009-0074, Sections C.8.d.iii., C.8.e.vi., C.8.f., C.8.g.ii., C.8.g.vii., C.10.a.i., C.10.a.ii., C.10.a.iii., C.10.b.ii., C.10.b.iii., C.10.c., C.10.d.i., C.10.d.ii., C.11.f., and C.12.f.

10-TC-02, 10-TC-03, and 10-TC-05

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 April 10, 2026 as follows:

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

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. R2-2009-0074, adopted by

¹ The entire reimbursement period is within the initial claim period because the Commission found the mandate is not reimbursable beginning January 1, 2018 since the claimants have fee authority, sufficient as a matter of law, to pay for the reimbursable activities pursuant to Government Code section 17556(d).

the San Francisco Bay Regional Water Quality Control Board on October 14, 2009, and effective on December 1, 2009.

The Commission adopted the Test Claim Decision on January 24, 2025, partially approving reimbursement for permittees that incur increased costs to perform the reimbursable activities under the mandate, and adopted the Decision and Parameters and Guidelines on March 28, 2025, approving reimbursement for the following eligible claimants:

- Alameda permittees include the Cities of Alameda, Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City, Alameda County (Unincorporated area), the Alameda County Flood Control and Water Conservation District, and Zone 7 of the Alameda County Flood Control and Water Conservation District.
- Santa Clara permittees include the Cities of Campbell, Cupertino, Los Altos, Milpitas, Monte Sereno, Mountain View, Palo Alto, San Jose, Santa Clara, Saratoga, and Sunnyvale, the towns of Los Altos Hills and Los Gatos, the Santa Clara Valley Water District, and Santa Clara County.
- Fairfield-Suisun permittees include the Cities of Fairfield and Suisun City, and Fairfield-Suisun Sewer District.
- Contra Costa permittees include the Cities of Clayton, Concord, El Cerrito, Hercules, Lafayette, Martinez, Orinda, Pinole, Pittsburg, Pleasant Hill, Richmond, San Pablo, San Ramon, and Walnut Creek, the towns of Danville and Moraga, Contra Costa County, and the Contra Costa County Flood Control and Water Conservation District.
- San Mateo permittees include the Cities of Belmont, Brisbane, Burlingame, Daly City, East Palo Alto, Foster City, Half Moon Bay, Menlo Park, Millbrae, Pacifica, Redwood City, San Bruno, San Carlos, San Mateo, and South San Francisco, the towns of Atherton, Colma, Hillsborough, Portola Valley, and Woodside, the San Mateo County Flood Control District, and San Mateo County.
- Vallejo permittees include the City of Vallejo and the Vallejo Sanitary District.²

The initial reimbursement period, which includes the entire reimbursement period, is December 1, 2009, through December 31, 2017 (seven months of fiscal year 2009-2010 through the first half of fiscal year 2017-2018).³ Eligible claimants were required to file initial claims with the State Controller's Office (Controller) on or before October 30, 2025. Late initial reimbursement claims may be filed until October 30, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.⁴

² Exhibit B, Decision and Parameters and Guidelines, page 14.

³ Exhibit B, Decision and Parameters and Guidelines, pages 14-15.

⁴ Government Code section 17561(d)(3).

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

A. Geomorphic Study (Section C.8.d.iii)

1. Permittees shall select a waterbody/reach, preferably one that contains significant fish and wildlife resources, and conduct one of the following projects within each county, except that only one such project must be completed within the collective Fairfield-Suisun and Vallejo Permittees' jurisdictions:
 - a. Gather geomorphic data to support the efforts of a local watershed partnership [fn. omitted] to improve creek conditions; or
 - b. Inventory locations for potential retrofit projects in which decentralized, landscape-based stormwater retention units can be installed; or
 - c. Conduct a geomorphic study which will help in development of regional curves which help estimate equilibrium channel conditions for different-sized drainages. Select a waterbody/reach that is not undergoing changing land use. Collect and report the following data:
 - Formally surveyed channel dimensions (profile), planform, and cross-sections. Cross-sections shall include the topmost floodplain terrace and be marked by a permanent, protruding (not flush with ground) monument.
 - Contributing drainage area.
 - Best available information on bankfull discharges and width and depth of channel formed by bankfull discharges.
 - Best available information on average annual rainfall in the study area.
2. Report selected geomorphic project results in the Integrated Monitoring Report.⁵

B. Sediment Delivery Estimate/Budget (Section C.8.e.vi.)

1. Permittees shall develop a design for a robust sediment delivery estimate/sediment budget in local tributaries and urban drainages by July 1, 2011, and implement the study by July 1, 2012.⁶

⁵ Exhibit A, Test Claim Decision, pages 370-371 citing to Test Claim, 10-TC-02, pages 221-222, 227 (Test claim permit, Section C.8.d.iii.).

⁶ Exhibit A, Test Claim Decision, page 371 citing to Test Claim, 10-TC-02, page 225 (Test claim permit, Section C.8.e.vi.).

C. Citizen Monitoring and Participation (Section C.8.f.), **which Is Reimbursable for the City of Vallejo and Vallejo Sanitary District only:**

1. Encourage Citizen Monitoring.
2. In developing Monitoring Projects and evaluating Status & Trends data, make reasonable efforts to seek out citizen and stakeholder information and comment regarding waterbody function and quality.
3. Demonstrate annually the permittee has encouraged citizen and stakeholder observations and reporting of waterbody conditions. Report on these outreach efforts in the annual Urban Creeks Monitoring Report.⁷

D. Monitoring Reporting and Notice (Sections C.8.g.ii., C.8.g.vii.)

1. Permittees shall maintain an information management system to support electronic transfer of data to the Regional Data Center of the California Environmental Data Exchange Network (CEDEN), located within the San Francisco Estuary Institute.⁸
2. Permittees shall submit an Electronic Status Monitoring Data Report, compatible with the SWAMP database, no later than January 15 of each year, reporting on all data collected during the previous October 1-September 30 period. Water quality objective exceedances are required to be highlighted in the report.⁹
3. Permittees shall notify stakeholders and members of the general public about the availability of electronic and paper monitoring reports through notices distributed through appropriate means, such as an electronic mailing list.¹⁰

E. Trash

1. Short-Term Trash Load Reduction Plan (Section C.10.a.i.). All permittees, except for flood management agencies, shall submit a Short-Term Trash Load Reduction Plan, including an implementation schedule, to the Regional Board by February 1, 2012. The Plan shall describe the following:
 - a. Control measures and best management practices, including any trash reduction ordinances, currently being implemented and the current level of implementation.

⁷ Exhibit A, Test Claim Decision, page 371 citing to Test Claim, 10-TC-02, page 225 (Test claim permit, Section C.8.f.).

⁸ Exhibit A, Test Claim Decision, page 372 citing to Test Claim, 10-TC-02, page 226, footnote 46 (Test claim permit, Section C.8.g.ii.).

⁹ Exhibit A, Test Claim Decision, page 372 citing to Test Claim, 10-TC-02, page 226 (Test claim permit, Section C.8.g.ii.).

¹⁰ Exhibit A, Test Claim Decision, page 372 citing to Test Claim, 10-TC-02, page 228 (Test claim permit, Section C.8.g.vii.).

- b. Additional control measures and best management practices that will be implemented, and/or an increased level of implementation designed to attain a 40 percent trash load reduction from its MS4 by July 1, 2014.
 - c. The Plan shall also “account for required mandatory minimum Full Trash Capture devices called for in Provision C.10.a.iii and Trash Hot Spot Cleanup called for in Provision C.10.b.”¹¹
2. Baseline Trash Load and Trash Load Reduction Tracking Method (Section C.10.a.ii.). All permittees, except for flood management agencies, shall comply with the following new requirements:
- a. Determine the baseline trash load from its MS4.
 - b. Submit the load level to the Regional Board by February 1, 2012. The February 1, 2012, report shall include the following:
 - Documentation of the methodology used to determine the load level.
 - A description of the trash load reduction tracking method that will be used to account for trash load reduction actions and to demonstrate progress and attainment of trash load reduction levels.
 - The submittal shall account for the drainage areas of a Permittee’s jurisdiction that are associated with the baseline trash load from its MS4, and the baseline trash load level per unit area by land use type and drainage area characteristics used to derive the total baseline trash load level for each Permittee.
 - c. Submit a progress report by February 1, 2011, indicating whether the permittee is determining its baseline trash load and trash load reduction method individually or collaboratively with other Permittees and a summary of the approach being used.¹²
3. Minimum Full Trash Capture (Section C.10.a.iii.). Except as provided below, all permittees shall comply with the following requirements:
- Install and maintain a mandatory minimum number of full trash capture devices by July 1, 2014, to treat runoff from an area equivalent to 30 percent of Retail/Wholesale Land draining to MS4s within their jurisdictions. The scope of this requirement is as follows:
- A full capture system or device is “any single device or series of devices that traps all particles retained by a 5 mm mesh screen and has a design

¹¹ Exhibit A, Test Claim Decision, page 372 citing to Test Claim, 10-TC-02, page 233 (Test claim permit, Section C.10.a.i).

¹² Exhibit A, Test Claim Decision, page 373 citing to Test Claim, 10-TC-02, pages 233-234 (Test claim permit, Section C.10.a.ii.).

treatment capacity of not less than the peak flow rate Q resulting from a one-year, one-hour, storm in the subdrainage area”.

- The mandatory minimum number of full trash capture devices for each permittee is identified in Attachment J to the test claim permit, Tables 10-1 and 10-2. However, if the sum of the areas generating trash loads determined pursuant to Section C.10.a.ii is a smaller acreage than the required trash capture acreage, the minimum full trash capture requirement is reduced to the smaller acreage for the population-based permittee.¹³

The requirements to install and maintain full trash capture devices **does not apply**:

- To a population-based permittee with a population less than 12,000 and retail/wholesale land less than 40 acres, or a population less than 2000.¹⁴
- To full trash capture devices installed by a permittee *before* the effective date of the test claim permit, which may be counted towards the minimum number of full trash capture devices identified in Attachment J, provided the device meets the permit’s definition of a full trash capture device.¹⁵

4. Trash Hot Spots (C.10.b.ii. and iii.)

- a. The permittees shall each submit selected Trash Hot Spots to the Regional Board by July 1, 2010. (Section C.10.b.ii.)¹⁶
- b. Hot Spot Assessments. (Section C.10.b.iii.)
 - i. The San Mateo and Fairfield-Suisun permittees shall comply with the following new requirements:
 - Identify the dominant types of trash (e.g., glass, plastics, paper) removed.

¹³ Exhibit A, Test Claim Decision, page 373 citing to Test Claim, 10-TC-02, pages 234, 411 et seq., and 415 et seq. (Test claim permit, Section C.10.a.iii., Attachment J, Tables 10-1, 10-2).

¹⁴ Exhibit A, Test Claim Decision, page 374 citing to Test Claim, 10-TC-02, page 234 (Test claim permit, Section C.10.a.iii.).

¹⁵ Exhibit A, Test Claim Decision, page 374 citing to Test Claim, 10-TC-02, page 234 (Test claim permit, Section C.10.a.iii.); Code of Federal Regulations, title 40, section 122.41(e).

¹⁶ Exhibit A, Test Claim Decision, page 374 citing to Test Claim, 10-TC-02, page 235 (Test claim permit, Section C.10.b.ii.).

- Document the trash conditions before and after clean-up of the entire hot spot using photo documentation with a minimum of one photo per 50 feet of hot spot length.
- ii. The Contra Costa permittees shall comply with the following new requirement:
- Document the trash conditions before and after clean-up of the entire hot spot using photo documentation with a minimum of one photo per 50 feet of hot spot length.
- iii. The Vallejo permittees shall comply with the following new requirements:
- Quantify the volume of material removed from each trash hot spot cleanup.
 - Identify the dominant types of trash removed (e.g., glass, plastics, paper).
 - Document the trash condition before and after cleanup using photo documentation, with a minimum of one photo per 50 feet of hot spot length.¹⁷
5. Long-Term Trash Load Reduction Plan (Section C.10.c.). All permittees, except for flood management agencies, shall submit a Long-Term Trash Load Reduction Plan, including an implementation schedule, to the Water Board by February 1, 2014. The Plan shall describe the control measures and best management practices, including any trash reduction ordinances, that are being implemented and the level of implementation and additional control measures and best management practices that will be implemented, and/or an increased level of implementation designed to attain a 70 percent trash load reduction from its MS4 by July 1, 2017, and 100 percent by July 1, 2022.¹⁸
6. Reporting and Document Retention (Sections C.10.d.i. and C.10.d.ii.)
- a. The Fairfield-Suisun, San Mateo, and Vallejo permittees shall comply with the following new requirement:
- In each annual report, report on the dominant types of trash removed and retain these records.¹⁹
- b. All permittees shall comply with the following new requirements:

¹⁷ Exhibit A, Test Claim Decision, pages 374-375 citing to Test Claim, 10-TC-02, page 235 (Test claim permit, Section C.10.b.iii.).

¹⁸ Exhibit A, Test Claim Decision, page 375 citing to Test Claim, 10-TC-02, page 235 (Test claim permit, Section C.10.c.).

¹⁹ Exhibit A, Test Claim Decision, page 375 citing to Test Claim, 10-TC-02, pages 235-236 (Test claim permit, Sections C.10.d.i. and C.10.d.ii.).

- In each Annual Report, provide total trash loads and dominant types of trash *for each type of action, including each trash hot spot selected* pursuant to Section C.10.b. and retain these records.²⁰
- Beginning with the 2012 annual report, report the percent annual trash load reduction relative to the permittee's baseline trash load.²¹

F. Mercury and PCB Diversion Studies (Sections C.11.f., C.12.f.)

1. Permittees shall conduct feasibility evaluations for mercury and PCBs by selecting five stormwater pump stations and five alternates for each pollutant and evaluate drainage characteristics and the feasibility of diverting flows of each to the sanitary sewer. The feasibility evaluations shall include, but not be limited to, costs, benefits, and impacts on the stormwater and wastewater agencies and the receiving waters relevant to the diversion and treatment of the dry weather and first flush flows.
2. From these feasibility evaluations, select five pump stations and five alternates for the pilot diversion studies for each pollutant. At least one urban runoff diversion pilot project shall be implemented in each of the five counties (San Mateo, Contra Costa, Alameda, Santa Clara, and Solano). The pilot and alternate locations should be located in industrially-dominated catchments where elevated PCB concentrations are documented.
3. Implement flow diversion of mercury and PCBs to the sanitary sewer at five pilot pump stations.
4. As part of the pilot studies, the permittees shall monitor, measure, and report mercury and PCBs load reduction.
5. Report the following information to the Regional Board:
 - a. Summarize the results of the feasibility evaluations in the 2010 Annual Report. The reports shall include the selection criteria leading to the identification of the five candidate and five alternate pump stations for pilot studies; time schedules for conducting the pilot studies; and a proposed method for distributing mercury load reductions to participating wastewater and stormwater agencies.
 - b. Report annually on the status of the pilot studies in each subsequent annual report.
 - c. Include in the March 15, 2014 Integrated Monitoring Report, the following information for each study: evaluation of pilot programs effectiveness,

²⁰ Exhibit A, Test Claim Decision, page 375 citing to Test Claim, 10-TC-02, pages 235-236 (Test claim permit, Sections C.10.d.i. and C.10.d.ii.).

²¹ Exhibit A, Test Claim Decision, page 375 citing to Test Claim, 10-TC-02, pages 235-236 (Test claim permit, Section C.10.d.i.).

mercury and PCBs loads reduced, and updated feasibility evaluation procedures to guide future diversion project selection.²²

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 (including, but not limited to grant 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.²³

Offsetting revenues identified in the reimbursement claims totaled \$19,473 for fiscal year 2011-2012, which were identified by the Town of Danville. The source of the offsetting revenue was not identified in the claim.

Statewide Cost Estimate

Staff reviewed 153 unaudited reimbursement claims submitted by 23 cities and towns, four counties, and one special district, 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

A. Geomorphic Study (Section C.8.d.iii)	
1. Permittees shall select a waterbody/reach, preferably one that contains significant fish and wildlife resources, and conduct one of the following projects within each county, except that only one such project must be completed within the collective Fairfield-Suisun and Vallejo Permittees’ jurisdictions: <ul style="list-style-type: none"> a. Gather geomorphic data to support the efforts of a local watershed partnership [fn. omitted] to improve creek conditions; or b. Inventory locations for potential retrofit projects in which decentralized, landscape-based stormwater retention units can be installed; or c. Conduct a geomorphic study which will help in development of regional curves which 	\$531,203 - \$1,460,831

²² Exhibit A, Test Claim Decision, pages 375-376 citing to Test Claim, 10-TC-02, pages 240-241, 248-249 (Test claim permit, Sections C.11.f., C.12.f.).

²³ Exhibit B, Decision and Parameters and Guidelines, page 24.

<p>help estimate equilibrium channel conditions for different-sized drainages. Select a waterbody/reach that is not undergoing changing land use. Collect and report the following data:</p> <ul style="list-style-type: none"> • Formally surveyed channel dimensions (profile), planform, and cross-sections. Cross-sections shall include the topmost floodplain terrace and be marked by a permanent, protruding (not flush with ground) monument. • Contributing drainage area. • Best available information on bankfull discharges and width and depth of channel formed by bankfull discharges. • Best available information on average annual rainfall in the study area. 	
2. Report selected geomorphic project results in the Integrated Monitoring Report.	\$12,481 - \$34,335
B. Sediment Delivery Estimate/Budget (Section C.8.e.vi.)	
Permittees shall develop a design for a robust sediment delivery estimate/sediment budget in local tributaries and urban drainages by July 1, 2011, and implement the study by July 1, 2012.	\$184,602 - \$507,659
C. Citizen Monitoring and Participation (Section C.8.f.), which Is Reimbursable for the City of Vallejo and Vallejo Sanitary District only:	
1. Encourage Citizen Monitoring.	\$262,995
2. In developing Monitoring Projects and evaluating Status & Trends data, make reasonable efforts to seek out citizen and stakeholder information and comment regarding waterbody function and quality.	\$0
3. Demonstrate annually the permittee has encouraged citizen and stakeholder observations and reporting of waterbody conditions. Report on these outreach efforts in the annual Urban Creeks Monitoring Report.	\$17,996
D. Monitoring Reporting and Notice (Sections C.8.g.ii., C.8.g.vii.)	
1. Permittees shall maintain an information management system to support electronic transfer of data to the Regional Data Center of the California Environmental Data Exchange Network (CEDEN), located within the San Francisco Estuary Institute.	\$25,878 - \$71,154

<p>2. Permittees shall submit an Electronic Status Monitoring Data Report, compatible with the SWAMP database, no later than January 15 of each year, reporting on all data collected during the previous October 1-September 30 period. Water quality objective exceedances are required to be highlighted in the report.</p>	<p>\$416,753 - \$1,146,069</p>
<p>3. Permittees shall notify stakeholders and members of the general public about the availability of electronic and paper monitoring reports through notices distributed through appropriate means, such as an electronic mailing list.</p>	<p>\$3,777</p>
<p>E. Trash</p>	
<p>1. Short-Term Trash Load Reduction Plan (Section C.10.a.i.). All permittees, except for flood management agencies, shall submit a Short-Term Trash Load Reduction Plan, including an implementation schedule, to the Regional Board by February 1, 2012. The Plan shall describe the following:</p> <ol style="list-style-type: none"> a. Control measures and best management practices, including any trash reduction ordinances, currently being implemented and the current level of implementation. b. Additional control measures and best management practices that will be implemented, and/or an increased level of implementation designed to attain a 40 percent trash load reduction from its MS4 by July 1, 2014. c. The Plan shall also “account for required mandatory minimum Full Trash Capture devices called for in Provision C.10.a.iii and Trash Hot Spot Cleanup called for in Provision C.10.b.” 	<p>\$489,985 - \$1,306,645</p>
<p>2. Baseline Trash Load and Trash Load Reduction Tracking Method (Section C.10.a.ii.). All permittees, except for flood management agencies, shall comply with the following new requirements:</p> <ol style="list-style-type: none"> a. Determine the baseline trash load from its MS4. b. Submit the load level to the Regional Board by February 1, 2012. The February 1, 2012, report shall include the following: <ul style="list-style-type: none"> • Documentation of the methodology used to determine the load level. • A description of the trash load reduction tracking method that will be used to account for trash load reduction actions and to demonstrate 	<p>\$197,078 - \$525,533</p>

<p>progress and attainment of trash load reduction levels.</p> <ul style="list-style-type: none"> The submittal shall account for the drainage areas of a Permittee's jurisdiction that are associated with the baseline trash load from its MS4, and the baseline trash load level per unit area by land use type and drainage area characteristics used to derive the total baseline trash load level for each Permittee. <p>c. Submit a progress report by February 1, 2011, indicating whether the permittee is determining its baseline trash load and trash load reduction method individually or collaboratively with other Permittees and a summary of the approach being used.</p>	
<p>3. Minimum Full Trash Capture (Section C.10.a.iii.). Except as provided below, all permittees shall comply with the following requirements:</p> <p>Install and maintain a mandatory minimum number of full trash capture devices by July 1, 2014, to treat runoff from an area equivalent to 30 percent of Retail/Wholesale Land draining to MS4s within their jurisdictions. The scope of this requirement is as follows:</p> <ul style="list-style-type: none"> A full capture system or device is "any single device or series of devices that traps all particles retained by a 5 mm mesh screen and has a design treatment capacity of not less than the peak flow rate Q resulting from a one-year, one-hour, storm in the subdrainage area". The mandatory minimum number of full trash capture devices for each permittee is identified in Attachment J to the test claim permit, Tables 10-1 and 10-2. However, if the sum of the areas generating trash loads determined pursuant to Section C.10.a.ii is a smaller acreage than the required trash capture acreage, the minimum full trash capture requirement is reduced to the smaller acreage for the population-based permittee. <p>The requirements to install and maintain full trash capture devices <i>does not apply</i>:</p> <ul style="list-style-type: none"> To a population-based permittee with a population less than 12,000 and 	<p>\$2,979,562 - \$8,193,799</p>

<p>retail/wholesale land less than 40 acres, or a population less than 2000.</p> <ul style="list-style-type: none"> To full trash capture devices installed by a permittee <i>before</i> the effective date of the test claim permit, which may be counted towards the minimum number of full trash capture devices identified in Attachment J, provided the device meets the permit’s definition of a full trash capture device. 	
<p>4. Trash Hot Spots (C.10.b.ii. and iii.)</p>	<p>\$157,275 - \$432,508</p>
<p>a. The permittees shall each submit selected Trash Hot Spots to the Regional Board by July 1, 2010. (Section C.10.b.ii.)</p> <p>b. Hot Spot Assessments. (Section C.10.b.iii.)</p> <p>i. The San Mateo and Fairfield-Suisun permittees shall comply with the following new requirements:</p> <ul style="list-style-type: none"> Identify the dominant types of trash (e.g., glass, plastics, paper) removed. Document the trash conditions before and after clean-up of the entire hot spot using photo documentation with a minimum of one photo per 50 feet of hot spot length. <p>ii. The Contra Costa permittees shall comply with the following new requirement:</p> <ul style="list-style-type: none"> Document the trash conditions before and after clean-up of the entire hot spot using photo documentation with a minimum of one photo per 50 feet of hot spot length. <p>iii. The Vallejo permittees shall comply with the following new requirements:</p> <ul style="list-style-type: none"> Quantify the volume of material removed from each trash hot spot cleanup. Identify the dominant types of trash removed (e.g., glass, plastics, paper). Document the trash condition before and after cleanup using photo documentation, with a minimum of one photo per 50 feet of hot spot length. 	
<p>5. Long-Term Trash Load Reduction Plan (Section C.10.c.). All permittees, except for flood management agencies, shall submit a Long-Term Trash Load Reduction Plan, including an implementation schedule, to the Water Board by February 1, 2014. The Plan</p>	<p>\$519,930 - \$1,386,495</p>

shall describe the control measures and best management practices, including any trash reduction ordinances, that are being implemented and the level of implementation and additional control measures and best management practices that will be implemented, and/or an increased level of implementation designed to attain a 70 percent trash load reduction from its MS4 by July 1, 2017, and 100 percent by July 1, 2022.	
<p>6. Reporting and Document Retention (Sections C.10.d.i. and C.10.d.ii.)</p> <p>a. The Fairfield-Suisun, San Mateo, and Vallejo permittees shall comply with the following new requirement:</p> <ul style="list-style-type: none"> • In each annual report, report on the dominant types of trash removed and retain these records.²⁴ <p>b. All permittees shall comply with the following new requirements:</p> <ul style="list-style-type: none"> • In each Annual Report, provide total trash loads and dominant types of trash <i>for each type of action, including each trash hot spot selected</i> pursuant to Section C.10.b. and retain these records. • Beginning with the 2012 annual report, report the percent annual trash load reduction relative to the permittee’s baseline trash load. 	\$119,236 - \$327,878
F. Mercury and Polychlorinated Biphenyls (PCBs) Diversion Studies (Sections C.11.f., C.12.f.)	
1. Permittees shall conduct feasibility evaluations for mercury and PCBs by selecting five stormwater pump stations and five alternates for each pollutant and evaluate drainage characteristics and the feasibility of diverting flows of each to the sanitary sewer. The feasibility evaluations shall include, but not be limited to, costs, benefits, and impacts on the stormwater and wastewater agencies and the receiving waters relevant to the diversion and treatment of the dry weather and first flush flows.	\$109,918 - \$302,292
2. From these feasibility evaluations, select five pump stations and five alternates for the pilot diversion studies for each pollutant. At least one urban runoff	\$59,249 - \$162,933

²⁴ Exhibit A, Test Claim Decision, page 375 citing to Test Claim, 10-TC-02, pages 235-236 (Test claim permit, Sections C.10.d.i. and C.10.d.ii.).

diversion pilot project shall be implemented in each of the five counties (San Mateo, Contra Costa, Alameda, Santa Clara, and Solano). The pilot and alternate locations should be located in industrially-dominated catchments where elevated PCB concentrations are documented	
3. Implement flow diversion of mercury and PCBs to the sanitary sewer at five pilot pump stations.	\$51,178 - \$140,750
4. As part of the pilot studies, the permittees shall monitor, measure, and report mercury and PCBs load reduction.	\$240,356 - \$660,972
5. Report the following information to the Regional Board: a. Summarize the results of the feasibility evaluations in the 2010 Annual Report. The reports shall include the selection criteria leading to the identification of the five candidate and five alternate pump stations for pilot studies; time schedules for conducting the pilot studies; and a proposed method for distributing mercury load reductions to participating wastewater and stormwater agencies. b. Report annually on the status of the pilot studies in each subsequent annual report. c. Include in the March 15, 2014 Integrated Monitoring Report, the following information for each study: evaluation of pilot programs effectiveness, mercury and PCBs loads reduced, and updated feasibility evaluation procedures to guide future diversion project selection.	\$358,537 - \$985,982
Subtotal Direct Costs	\$6,737,989 - \$17,930,603
Indirect Costs identified	\$122,131 - \$322,751
Offsetting Revenues or Other Reimbursements	(\$19,473)
10 Percent Late Filing Penalty	(\$0 - \$1,151,536)
Total Costs	\$6,840,647 - \$17,082,345

Draft Proposed Statewide Cost Estimate and Comments

On March 4, 2026, Commission staff issued the Draft Proposed Statewide Cost Estimate.²⁵ On March 16, 2026, the City of San Jose filed its comments on the Draft

²⁵ Exhibit C, Draft Proposed Statewide Cost Estimate.

Proposed Statewide Cost Estimate objecting to Assumption No. 5.²⁶ These comments are summarized and addressed below under Assumption No. 5.

Assumptions

1. The amount claimed for the period of reimbursement may be higher if late or amended claims are filed. Of the 77 eligible claimants, only 28 filed claims. As noted above, no costs may be claimed after December 31, 2017. For purposes of calculating the high-end projection of this Statewide Cost Estimate, it is presumed that no late or amended claims will be filed by the 28 claimants. This Statewide Cost Estimate is based on the claims filed and the claims which the 49 eligible non-filer claimants could file late.
2. The costs for Activities C.1, C.2, and C.3. regarding citizen monitoring and participation can only be claimed by City of Vallejo and Vallejo Sanitary District. Only the District filed costs for these activities. For purposes of calculating the high-end projection of this Statewide Cost Estimate, it is presumed that no additional costs will be claimed through late claiming.
3. Activity D.3. regarding notification of stakeholders and members of the general public about the availability of electronic and paper monitoring reports was only claimed by City of Santa Clara from 2010-2011 to 2014-2015. For purposes of calculating the high-end projection of this Statewide Cost Estimate, it is presumed that no other costs will be claimed by any other claimant.
4. Activities E.1., E.2., and E.5. regarding submitting a Short-Term Trash Load Reduction Plan, Baseline Trash Load and Trash Load Reduction Tracking reports, and a Long-Term Trash Load Reduction Plan, may not be claimed by flood management agencies. For purposes of calculating the high-end projection of this Statewide Cost Estimate, no ineligible claimants will be included in calculating projected claims costs.
5. Activity E.4. includes two activities: A) a one-time activity of submitting selected Trash Hot Spots to the Regional Board by July 1, 2010 for all claimants and B) Hot Spot assessments to be performed by only the San Mateo, Fairfield-Suisun, Contra Costa, and Vallejo permittees. Thus, there should be no claimed costs for the Alameda and Santa Clara permittees after the one-time activity is completed in 2010. However, the City of San Jose, a Santa Clara permittee, claimed \$163,530 plus indirect costs of \$12,654 for Activity E.4. in fiscal year 2017-2018. For purposes of calculating the high-end projection of this Statewide Cost Estimate, this delayed claimed cost will not be included.

On March 16, 2026, the City of San Jose filed comments on the Draft Proposed Statewide Cost Estimate objecting to Assumption No. 5, as follows:

²⁶ Exhibit D, Claimant's (City of San Jose's) Comments on the Draft Proposed Statewide Cost Estimate.

The City of San Jose disagrees that it presented a delayed claimed cost. The City of San Jose should not have been excluded from the Hot Spot Assessments in Section C.10.b.iii and should be allowed to claim costs related thereto. The City of San Jose respectfully requests that its claimed costs be included in the Statewide Cost Estimate.²⁷

No changes to this assumption are made. First, the costs claimed by the City of San Jose, as well as all costs claimed as filed with the Controller, are included in the low-end statewide cost estimate and, thus, all of the City's claimed costs are included in the Statewide Cost Estimate.²⁸

However, the City's costs are not included in the cost projections for possible late claims by non-filers. The Test Claim Decision concluded that the activity to assess hot spots did not mandate a new program or higher level of service for the Santa Clara permittees, which includes the City of San Jose. Hot spot assessments were only approved as new state-mandated activities for the San Mateo, Fairfield-Suisun, Contra Costa, and Vallejo permittees.²⁹ Cost projections are used to establish the amount of possible late claims by non-filers, that is, not the amount for the City of San Jose and the other 27 claimants who filed claims. Thus, for purposes of cost projections, the City of San Jose's costs claimed under Section C.10.b.iii were properly excluded as they represent statistical outliers that are not likely to be representative of costs by non-filers. In tailoring the high-end statewide cost estimate to be as reliable as possible, one-time costs and costs claimed in unexpected amounts or outside expected timelines are routinely removed from the calculation as detailed in the Assumptions. Finally, any exclusion from the cost projection calculation has no direct effect on the City of San Jose or any claimant because this Statewide Cost Estimate is created for state budgeting purposes.

6. Projected indirect costs are low because overhead was only claimed in 27 claims or 17.6% of claims filed.
7. Costs may be lower than projected if either no reimbursable costs were incurred or if costs of less than \$1,000 were incurred by non-filers, in which case a late reimbursement claim cannot be filed.³⁰
8. Costs may be lower if the Controller audits the claims and determines that costs were improperly claimed or were not supported.

²⁷ Exhibit D, Claimant's (City of San Jose's) Comments on the Draft Proposed Statewide Cost Estimate, page 1.

²⁸ See Methodology section, below.

²⁹ Exhibit A, Test Claim Decision, page 305.

³⁰ Government Code section 17564.

9. 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) were used by a claimant to pay for the reimbursement activities.

Methodology

As explained below, the low-end statewide cost estimate represents the costs actually claimed. The high-end statewide cost estimate represents the costs actually claimed plus the costs that could be claimed in late claims.

Activity A.1. consists of gathering geomorphic data, inventorying locations for potential retrofit projects, or conducting a geomorphic study. Activity A.1. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity A.1. actual costs claimed [\$531,203] / the number of filers [28] = average activity A.1. cost per filer [\$18,972]

Average activity A.1. cost per claim [\$18,972] x number of non-filers [49] = total estimated non-filed activity A.1. costs [\$929,628]

Activity A.1. actual costs claimed [\$531,203] + estimated non-filed activity A.1. costs that could be claimed in late claims [\$929,628] = Total potential activity A.1. costs [\$1,460,831]

Activity A.2. consists of reporting on gathered geomorphic data, inventoried locations for potential retrofit projects, or a geomorphic study. Activity A.2. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity A.2. actual costs claimed [\$12,481] / the number of filers [28] = average Activity A.2. cost per filer [\$446]

Average activity A.2. cost per filer [\$446] x number of non-filers [49] = total estimated non-filer Activity A.2. costs [\$21,854]

Activity A.2. actual costs claimed [\$12,481] + estimated non-filer Activity A.2. costs that could be claimed in late claims [\$21,854] = Total potential Activity A.2. costs [\$34,335]

Activity B. consists of developing a design for a sediment delivery estimate/sediment budget in local tributaries and urban drainages. Activity B. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity B. actual costs claimed [\$184,602] / the number of filers [28] = average Activity B. cost per filer [\$6,593]

Average activity B. cost per filer [\$6,593] x number of non-filers [49] = total estimated non-filer Activity B. costs [\$323,057]

Activity B. actual costs claimed [\$184,602] + estimated non-filer Activity B. costs that could be claimed in late claims [\$323,057] = Total potential Activity B. costs [\$507,659]

Activity C.1. consists of encouraging citizen monitoring. Activity C.1. actual costs are \$262,995. This activity only has two eligible claimants, both of which filed claims and thus, there is no projection for non-filer claimants.

Activity C.2. consists of seeking out citizen and stakeholder information and comment regarding waterbody function and quality. Activity C.2. only has two eligible claimants and neither filed claims. Thus, there is no projection for non-filer claimants.

Activity C.3. consists of demonstrating and reporting on encouraging citizen monitoring. Activity C.3. actual costs are \$17,996. This activity only has two eligible claimants, both of which filed claims and thus, there is no projection for non-filer claimants.

Activity D.1. consists of maintaining an information management system. Activity D.1. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity D.1. actual costs claimed [\$25,878] / the number of filers [28] = average Activity D.1. cost per filer [\$924]

Average activity D.1. cost per filer [\$924] x number of non-filers [49] = total estimated non-filer Activity D.1. costs [\$45,276]

Activity D.1. actual costs claimed [\$25,878] + estimated non-filer Activity D.1. costs that could be claimed in late claims [\$45,276] = Total potential Activity D.1. costs [\$71,154]

Activity D.2. consists of annually submitting an Electronic Status Monitoring Data Report. Activity D.2. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity D.2. actual costs claimed [\$416,753] / the number of filers [28] = average Activity D.2. cost per filer [\$14,884]

Average activity D.2. cost per filer [\$14,884] x number of non-filers [49] = total estimated non-filer Activity D.2. costs [\$729,316]

Activity D.2. actual costs claimed [\$416,753] + estimated non-filer Activity D.2. costs that could be claimed in late claims [\$729,316] = Total potential Activity D.2. costs [\$1,146,069]

Activity D.3. consists of notifying stakeholders and members of the general public about the availability of electronic and paper monitoring reports. Activity D.3. was only claimed by a single claimant with actual costs of \$3,777 and thus, there is no projection for eligible claimants that have not yet filed claims.

Activity E.1. consists of submitting a Short-Term Trash Load Reduction Plan. Activity E.1. claims are calculated by using the average costs claimed multiplied by the number

of eligible claimants that have not yet filed claims. Flood control agencies are ineligible to claim costs for this activity.

Activity E.1. actual costs claimed [\$489,985] / the number of filers [27] = average Activity E.1. cost per filer [\$18,148]

Average activity E.1. cost per filer [\$18,148] x number of non-filers [45] = total estimated non-filer Activity E.1. costs [\$816,660]

Activity E.1. actual costs claimed [\$489,985] + estimated non-filer Activity E.1. costs that could be claimed in late claims [\$816,660] = Total potential Activity E.1. costs [\$1,306,645]

Activity E.2. consists of submitting Baseline Trash Load and Trash Load Reduction Tracking reports. Activity E.2. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims. Flood control agencies are ineligible to claim costs for this activity.

Activity E.2. actual costs claimed [\$197,078] / the number of filers [27] = average Activity E.2. cost per filer [\$7,299]

Average activity E.2. cost per filer [\$7,299] x number of non-filers [45] = total estimated non-filer Activity E.2. costs [\$328,455]

Activity E.2. actual costs claimed [\$197,078] + estimated non-filer Activity E.2. costs that could be claimed in late claims [\$328,455] = Total potential Activity E.2. costs [\$525,533]

Activity E.3. consists of installing and maintaining a mandatory minimum number of full trash capture devices. Activity E.3. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity E.3. actual costs claimed [\$2,979,562] / the number of filers [28] = average Activity E.3. cost per filer [\$106,413]

Average activity E.3. cost per filer [\$106,413] x number of non-filers [49] = total estimated non-filer Activity E.3. costs [\$5,214,237]

Activity E.3. actual costs claimed [\$2,979,562] + estimated non-filer Activity E.3. costs that could be claimed in late claims [\$5,214,237] = Total potential Activity E.3. costs [\$8,193,799]

Activity E.4. consists of submitting selected Trash Hot Spots to the Regional Board or, for certain claimants, performing Hot Spot assessments. Activity E.4. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity E.4. actual costs claimed [\$157,275] / the number of filers [28] = average Activity E.4. cost per filer [\$5,617]

Average activity E.4. cost per filer [\$5,617] x number of non-filers [49] = total estimated non-filer Activity E.4. costs [\$275,233]

Activity E.4. actual costs claimed [\$157,275] + estimated non-filer Activity E.4. costs that could be claimed in late claims [\$275,233] = Total potential Activity E.4. costs [\$432,508]

Activity E.5. consists of submitting a Long-Term Trash Load Reduction Plan. Activity E.5. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims. Flood control agencies are ineligible to claim costs for this activity.

Activity E.5. actual costs claimed [\$519,930] / the number of filers [27] = average Activity E.5. cost per filer [\$19,257]

Average activity E.5. cost per filer [\$19,257] x number of non-filers [45] = total estimated non-filer Activity E.5. costs [\$866,565]

Activity E.5. actual costs claimed [\$519,930] + estimated non-filer Activity E.5. costs that could be claimed in late claims [\$866,565] = Total potential Activity E.5. costs [\$1,386,495]

Activity E.6. consists of annually providing total trash loads and dominant types of trash. Activity E.6. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity E.6. actual costs claimed [\$119,236] / the number of filers [28] = average Activity E.6. cost per filer [\$4,258]

Average activity E.6. cost per filer [\$4,258] x number of non-filers [49] = total estimated non-filer Activity E.6. costs [\$208,642]

Activity E.6. actual costs claimed [\$119,236] + estimated non-filer Activity E.6. costs that could be claimed in late claims [\$208,642] = Total potential Activity E.6. costs [\$327,878]

Activity F.1. consists of conducting feasibility evaluations for mercury and PCBs. Activity F.1. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity F.1. actual costs claimed [\$109,918] / the number of filers [28] = average Activity F.1. cost per filer [\$3,926]

Average activity F.1. cost per filer [\$3,926] x number of non-filers [49] = total estimated non-filer Activity F.1. costs [\$192,374]

Activity F.1. actual costs claimed [\$109,918] + estimated non-filer Activity F.1. costs that could be claimed in late claims [\$192,374] = Total potential Activity F.1. costs [\$302,292]

Activity F.2. consists of selecting pilot pump stations for the feasibility evaluations for mercury and PCBs. Activity F.2. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity F.2. actual costs claimed [\$59,249] / the number of filers [28] = average Activity F.2. cost per filer [\$2,116]

Average activity F.2. cost per filer [\$2,116] x number of non-filers [49] = total estimated non-filer Activity F.2. costs [\$103,684]

Activity F.2. actual costs claimed [\$59,249] + estimated non-filer Activity F.2. costs that could be claimed in late claims [\$103,684] = Total potential Activity F.2. costs [\$162,933]

Activity F.3. consists of implementing flow diversion of mercury and PCBs to the sanitary sewer at five pilot pump stations. Activity F.3. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity F.3. actual costs claimed [\$51,178] / the number of filers [28] = average Activity F.3. cost per filer [\$1,828]

Average activity F.3. cost per filer [\$1,828] x number of non-filers [49] = total estimated non-filer Activity F.3. costs [\$89,572]

Activity F.3. actual costs claimed [\$51,178] + estimated non-filer Activity F.3. costs that could be claimed in late claims [\$89,572] = Total potential Activity F.3. costs [\$140,750]

Activity F.4. consists of monitoring, measuring, and reporting mercury and PCBs load reduction. Activity F.4. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity F.4. actual costs claimed [\$240,356] / the number of filers [28] = average Activity F.4. cost per filer [\$8,584]

Average activity F.4. cost per filer [\$8,584] x number of non-filers [49] = total estimated non-filer Activity F.4. costs [\$420,616]

Activity F.4. actual costs claimed [\$240,356] + estimated non-filer Activity F.4. costs that could be claimed in late claims [\$420,616] = Total potential Activity F.4. costs [\$660,972]

Activity F.5. consists of annual reporting on the feasibility evaluations and status of pilot studies. Activity F.5. claims are calculated by using the average costs claimed multiplied by the number of eligible claimants that have not yet filed claims.

Activity F.5. actual costs claimed [\$358,537] / the number of filers [28] = average Activity F.5. cost per filer [\$12,805]

Average activity F.5. cost per filer [\$12,805] x number of non-filers [49] = total estimated non-filer Activity F.5. costs [\$627,445]

Activity F.5. actual costs claimed [\$358,537] + estimated non-filer Activity F.5. costs that could be claimed in late claims [\$627,445] = Total potential Activity F.5. costs [\$985,982]

Indirect Costs: The low end of the range for indirect costs is those indirect costs actually claimed. The high end, 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 [\$122,131] / Direct Costs Actually Claimed [\$6,737,989] = Average Indirect Cost Rate [1.8%].

Indirect Cost Rate [1.8%] x Estimated Direct Costs (sum of all claimed and estimated activity costs for the initial claim period) [\$17,930,603] = High End of the Estimated Indirect Costs [\$322,751].

Offsetting Revenues: The low end of the range for offsetting revenues is the total amount of offsetting revenues actually claimed. Offsetting revenue was only claimed by one claimant for a single fiscal year and thus, there is no projection for eligible claimants that have not yet filed claims.

Late Filing Penalties: The low end is \$0 because none of the claims compiled by the Controller were assessed a late filing penalty. The high end assumes all eligible claimants, who have not yet filed, will file claims for reimbursement, which will be subject to a late filing penalty. The costs for potential late claims are estimated by adding estimated non-filed direct and indirect costs and subtracting offsets to get net costs. Finally, the net costs are multiplied by a ten percent late filing penalty to estimate the high-end late filing penalties.

Estimated Non-filer Direct Costs [\$11,192,614] + Estimated Non-filer Indirect Costs [\$322,751] – Estimated Non-filer Offsets [\$0] = Estimated Non-filer Net Costs [\$11,515,365].

Estimated Non-filer Net Costs [\$11,515,365] x (10% late filing penalty) = Estimated Non-filer Late Filing Penalties [\$1,151,536].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties [\$1,151,536] = High End of Estimated Late Filing Penalties [\$1,151,536].

Staff Recommendation

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$6,840,647 – \$17,082,345 for the Initial Claim Period that began on December 1, 2009 and ends on December 31, 2017.

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 23, 2026, I served the:

- **Current Mailing List dated March 18, 2026**
- **Proposed Statewide Cost Estimate issued March 23, 2026**

*California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2009-0074, 10-TC-02, 10-TC-03, and 10-TC-05*

*California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2009-0074, Sections C.8.d.iii., C.8.e.vi., C.8.f., C.8.g.ii., C.8.g.vii.,
C.10.a.i., C.10.a.ii., C.10.a.iii., C.10.b.ii., C.10.b.iii., C.10.c., C.10.d.i., C.10.d.ii.,
C.11.f., and C.12.f.; Adopted October 14, 2009, and Effective December 1, 2009*

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 23, 2026 at Sacramento, California.



Jill Magee
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814
(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 3/18/26

Claim Number: 10-TC-02, 10-TC-03, and 10-TC-05

Matter: California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2009-0074

Claimants: City of Dublin
City of San Jose
County of Santa Clara

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.)

Adaoha Agu, *County of San Diego Auditor & Controller Department*

Projects, Revenue and Grants Accounting, 5530 Overland Avenue, Ste. 410 , MS:O-53, San Diego,
CA 92123

Phone: (858) 694-2129

Adaoha.Agu@sdcounty.ca.gov

Nicholas Ajluni, Assistant Director of Utilities and Environmental Services, *City of Pleasanton*

PO Box 520, Pleasanton, CA 04566

Phone: (925) 931-5523

najluni@cityofpleasantonca.gov

Daniel Akagi, Associate Civil Engineer, *City of Berkeley*

1947 Center Street, 4th Floor, Berkeley, CA 94704

Phone: (510) 981-6394

dakagi@ci.berkeley.ca.us

Mohamed Alaoui, Public Works Director, *City of Emeryville*

1333 Park Avenue, Emeryville, CA 94608

Phone: (510) 596-4330

Public_Works@emeryville.org

Fai Ali, Director of Engineering and Public Works, *City of Millbrae*

621 Magnolia Avenue, Millbrae, CA 94030

Phone: (650) 259-2339

fali@ci.millbrae.ca.us

Nicole Almaguer, Environmental Specialist, *City of Albany*

1000 San Pablo Avenue , Albany, CA 94706

Phone: (510) 528-5754
nalmaguer@albanyca.org

Mariles Alvarez, Accountant III, *County of Santa Clara*
Controller-Treasurer, 70 West Hedding Street, San Jose, CA 95110
Phone: (408) 299-6831
mariles.alvarez@fin.sccgov.org

Rachelle Anema, Assistant Auditor-Controller, *County of Los Angeles*
Accounting Division, 500 W. Temple Street, Los Angeles, CA 90012
Phone: (213) 974-8321
RANEMA@auditor.lacounty.gov

Lili Apgar, Specialist, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 324-0254
lapgar@sco.ca.gov

Socorro Aquino, *State Controller's Office*
Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-7522
SAquino@sco.ca.gov

Aaron Avery, Legislative Representative, *California Special Districts Association*
1112 I Street Bridge, Suite 200, Sacramento, CA 95814
Phone: (916) 442-7887
Aarona@cnda.net

John Bakker, Partner, *Redwood Public Law*
409 13th St., Suite 600, Oakland, CA 94612
Phone: (510) 877-5815
john.bakker@redwoodpubliclaw.com

Jim Barse, Clean Water Program Specialist, *City of Alameda*
950 West Mall Square, Room 110, Alameda, CA 94501
Phone: (510) 749-5857
jbarse@alamedaca.gov

David Bass, Vice Mayor, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 663-8504
David.Bass@rocklin.ca.us

Jeanette Bazar, *County of Santa Clara*
Controller-Treasurer Department, 70 W. Hedding Street, East Wing, 2nd Floor, San Jose, CA 95112
Phone: (408) 299-5225
Jeanette.Bazar@fin.sccgov.org

Gerry Beaudin, City Manager, *City of Pleasanton*
123 Main Street, PO Box 520, Pleasanton, CA 94566
Phone: (925) 931-5002
gbeaudin@cityofpleasantonca.gov

Ginni Bella Navarre, Deputy Legislative Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8342
Ginni.Bella@lao.ca.gov

David Benoun, City Attorney, *City of Newark*
37101 Newark Boulevard, Newark, CA 94560
Phone: (510) 578-4427
david.benoun@newark.org

Justin Bixby, Maintenance Worker II, *Town of Portola Valley*
765 Portola Road, Portola Valley, CA 94028
Phone: (650) 851-1700
jbixby@portolavalley.net

Richard Boon, Chief of Watershed Protection Division, *County of Riverside Flood Control District*
1995 Market Street, Riverside, CA 92501
Phone: (951) 955-1273
rboon@rivco.org

Jonathan Borrego, City Manager, *City of Oceanside*
300 North Coast Highway, Oceanside, CA 92054
Phone: (760) 435-3065
citymanager@oceansideca.org

Randy Breault, Director of Public Works/City Engineer, *City of Brisbane*
50 Park Place, Brisbane, CA 94005
Phone: (415) 508-2131
rbreault@ci.brisbane.ca.us

Andrew Brozyna, Public Works Director/City Engineer, *City of Foster City*
Public Works Department Engineering Division, 610 Foster City Boulevard, Foster City, CA 94404
Phone: (650) 286-3279
abrozyna@fostercity.org

Allan Burdick,
7525 Myrtle Vista Avenue, Sacramento, CA 95831
Phone: (916) 203-3608
allanburdick@gmail.com

Guy Burdick, Consultant, *MGT Consulting*
2251 Harvard Street, Suite 134, Sacramento, CA 95815
Phone: (916) 833-7775
gburdick@mgtconsulting.com

Rica Mae Cabigas, Chief Accountant, *Auditor-Controller*
Accounting Division, 500 West Temple Street, Los Angeles, CA 90012
Phone: (213) 974-8309
rcabigas@auditor.lacounty.gov

Evelyn Calderon-Yee, Bureau Chief, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 324-5919
ECalderonYee@sco.ca.gov

Julissa Ceja Cardenas, *California State Association of Counties*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
jcejacardenas@counties.org

Sheri Chapman, General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814

Phone: (916) 658-8267
schapman@calcities.org

Sean Charpentier, Executive Director, *City/County Association of Governments of San Mateo County*

555 County Center, 5th Floor, Redwood City, CA 94063
Phone: (650) 599-1409
scharpentier@smcgov.org

Ali Chemkhi, Senior Supervising Accountant/Auditor, *County of San Bernardino*

Office of Auditor-Controller, 268 West Hospitality Lane, Fourth Floor, San Bernardino, CA 92415-0018

Phone: (909) 382-7035
ali.chemkhi@sbccountyatc.gov

Matthew Chidester, City Manager, *City of Half Moon Bay*

501 Main Street, Half Moon Bay, CA 94019
Phone: (650) 726-8272
MChidester@hmbcity.com

Annette Chinn, *Cost Recovery Systems, Inc.*

705-2 East Bidwell Street, #294, Folsom, CA 95630
Phone: (916) 939-7901
achinners@aol.com

Carolyn Chu, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*

925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8326
Carolyn.Chu@lao.ca.gov

Michael Coleman, *Coleman Advisory Services*

2217 Isle Royale Lane, Davis, CA 95616
Phone: (530) 758-3952
coleman@muni1.com

Anthony Condotti, *Atchison, Barisone, Condotti & Kovacevich*

333 Church Street, Santa Cruz, CA 95060
Phone: (831) 423-8383
tcondotti@abc-law.com

Joshua Cosgrove, Director of Water and Wastewater Resources, *City of Daly City*

Department of Water and Water Resources, 333 90th Street, Daly City, CA 94015
Phone: (650) 991-8206
jcosgrove@dalycity.org

Office of the County Counsel, *County of Santa Clara*

Claimant Representative

Office of the County Counsel, 70 West Hedding Street, East Wing, 9th Floor, San Jose, CA 95110-1770

Phone: (408) 299-5920
elizabeth.pianca@cco.sccgov.org

Adam Cripps, Interim Finance Manager, *Town of Apple Valley*

14955 Dale Evans Parkway, Apple Valley, CA 92307
Phone: (760) 240-7000
acripps@applevalley.org

Terrance Davis, Public Works Director, *City of Berkeley*
1947 Center Street, 4th Floor, Berkeley, CA 94704
Phone: (510) 981-6300
PublicWorks@berkeleyca.gov

Thomas Deak, Senior Deputy, *County of San Diego*
Office of County Counsel, 1600 Pacific Highway, Room 355, San Diego, CA 92101
Phone: (619) 531-4810
Thomas.Deak@sdcounty.ca.gov

Nicole Denow, Chief Deputy City Attorney, *City of San Diego*
Environment Section, 1200 Third Avenue, Suite 1100, San Diego, CA 92101
Phone: (619) 533-6173
NDenow@sandiego.gov

Brad Donohue, Deputy Public Works Director, *Town of Colma*
1188 El Camino Real, Colma, CA 94014
Phone: (650) 757-8895
brad.donohue@colma.ca.gov

Kai Duong, Senior Accountant, *County of Santa Clara*
Controller-Treasurer, 70 West Hedding Street, San Jose, CA 95110
Phone: (408) 299-5233
kai.duong@fin.sccgov.org

Matt Fabry, Director of Public Works, *City of San Mateo*
330 West 20th Avenue, San Mateo, CA 94403
Phone: (650) 522-7309
mfabry@cityofsanmateo.org

Lolita Fernandes, Deputy City Attorney, *City of Redwood City*
1017 Middlefield Road , Redwood City , CA 94063
Phone: (650) 780-7200
lfernandes@redwoodcity.org

Kevin Fisher, Assistant City Attorney, *City of San Jose*
Environmental Services, 200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1987
kevin.fisher@sanjoseca.gov

Tim Flanagan, Office Coordinator, *County of Solano*
Register of Voters, 678 Texas Street, Suite 2600, Fairfield, CA 94533
Phone: (707) 784-3359
Elections@solanocounty.com

Jennifer Fordyce, Assistant Chief Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, 22nd floor, Sacramento, CA 95814
Phone: (916) 324-6682
Jennifer.Fordyce@waterboards.ca.gov

Craig Foster, Chief Operating Officer, *Building Industry Legal Defense Foundation*
Building Association of Southern California, 17744 Sky Park Circle, Suite 170, Irvine, Irvin 92614
Phone: (949) 553-9500
cfoster@biasc.org

Nora Frimann, City Attorney, *City of San Jose*
200 East Santa Clara Street, 16th Floor, San Jose, CA 95113

Phone: (408) 535-1900
nora.frimann@sanjoseca.gov

Sylvia Gallegos, Deputy County Executive, *County of Santa Clara*
70 West Hedding Street, 11th Floor, San Jose, CA 95110-1770
Phone: (408) 299-5106
sylvia.gallegos@ceo.sccgov.org

Juliana Gmur, Executive Director, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
juliana.gmur@csm.ca.gov

Sharon Gosselin, Associate Environmental Compliance Specialist, *County of Alameda, Alameda Co Flood Control & Water*
399 Elmhurst Street, Hayward, CA 94544
Phone: (510) 670-6547
sharon@acpwa.org

Gary Grimm, *Law Office of Gary J. Grimm*
2390 Vine Street, Berkeley, CA 94708
Phone: (510) 848-4140
ggrimm@garygrimmlaw.com

Kathy Guarnieri, Environmental Services Manager, *City of Fremont*
39550 Liberty Street, Fremont, CA 94537
Phone: (510) 494-4583
kcote@fremont.gov

Michael Guina, City Attorney, *City of Burlingame*
501 Primrose Road, Burlingame, CA 94010
Phone: (650) 558-7204
mguina@burlingame.org

Kristin Hathaway, Watershed and Stormwater Management Supervisor, *City of Oakland*
250 Frank H. Ogawa Plaza, Oakland, CA 94612-2034
Phone: (510) 238-7571
khathaway@oaklandca.gov

Viviana Heger, Special Counsel, *Duane Morris LLP*
865 Figueroa Street, Los Angeles, CA 90017-5450
Phone: (213) 689-7400
VHeger@duanemorris.com

Chris Hill, Principal Program Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, 8th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
Chris.Hill@dof.ca.gov

Tiffany Hoang, Associate Accounting Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 323-1127
THoang@sco.ca.gov

Ken Howell, Senior Management Auditor, *State Controller's Office*
Audits, Compliance Audits Bureau, 3301 C Street, Suite 725A, Sacramento, CA 95816

Phone: (916) 323-2368
KHowell@sco.ca.gov

Mary Eleonor Ignacio, Assistant City Attorney, *Redwood City*
400 County Ctr, Redwood City, CA 94063
Phone: (650) 780-7200
eignacio@redwoodcity.org

Irene Islas, *Best Best & Krieger, LLP*
2001 N Main St, Suite 390, Walnut Creek, CA 94596
Phone: (925) 977-3300
irene.islas@bbklaw.com

Jason Jennings, Director, *Maximus Consulting*
Financial Services, 808 Moorefield Park Drive, Suite 205, Richmond, VA 23236
Phone: (804) 323-3535
SB90@maximus.com

Angelo Joseph, Supervisor, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 323-0706
AJoseph@sco.ca.gov

Emma Jungwirth, Senior Legislative Advocate, *California State Association of Counties (CSAC)*
1100 K Street, Ste 101, Sacramento, CA 95814
Phone: (916) 650-8115
ejungwirth@counties.org

Anne Kato, Acting Chief, *State Controller's Office*
Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA
95816
Phone: (916) 322-9891
akato@sco.ca.gov

Michelle Kenyon, City Attorney, *City of Pacifica*
540 Crespi Drive, Pacifica, CA 94044
Phone: (650) 738-7409
cmoffice@pacificacounty.gov

Anita Kerezsi, *AK & Company*
2425 Golden Hill Road, Suite 106, Paso Robles, CA 93446
Phone: (805) 239-7994
akcompanysb90@gmail.com

Joanne Kessler, Fiscal Specialist, *City of Newport Beach*
Revenue Division, 100 Civic Center Drive, Newport Beach, CA 90266
Phone: (949) 644-3199
jkessler@newportbeachca.gov

Robin Kim, Wastewater Superintendent, *City of Redwood City*
1400 Broadway Street, Redwood City, CA 94063
Phone: (650) 780-7477
rkim@redwoodcity.org

Kristopher Kokotaylo, Partner, *Redwood Public Law*
409 13th St., Suite 600, Oakland, CA 94612

Phone: (510) 877-5830
kristopher.kokotaylo@redwoodpubliclaw.com

Lisa Kurokawa, Bureau Chief for Audits, *State Controller's Office*
Compliance Audits Bureau, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 327-3138
lkurokawa@sco.ca.gov

Anya Kwan, Associate, *Best Best & Krieger LLP*
300 South Grand Ave., 25th Floor, Los Angeles, CA 90071
Phone: (213) 542-3867
Anya.Kwan@bbkllaw.com

Terence Kyaw, Public Works Service Director, *City of Redwood City*
1400 Broadway Street, Redwood City, CA 94063-2505
Phone: (650) 780-7466
tkyaw@redwoodcity.org

Justin Lai, *City of Foster City*
Public Works, 610 Foster City Boulevard, Foster City, CA 94404
Phone: (650) 286-3270
jlai@fostercity.org

Margo Laskowska, Sr. Deputy City Attorney, *City of San Jose*
Office of the City Attorney, 200 E Santa Clara St, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1900
margo.laskowska@sanjoseca.gov

Michael Lauffer, Chief Counsel, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5183
michael.lauffer@waterboards.ca.gov

Government Law Intake, *Department of Justice*
Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255, Sacramento, CA 94244-2550
Phone: (916) 210-6046
governmentlawintake@doj.ca.gov

Eric Lawyer, Legislative Advocate, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 650-8112
elawyer@counties.org

Kim-Anh Le, Deputy Controller, *County of San Mateo*
555 County Center, 4th Floor, Redwood City, CA 94063
Phone: (650) 599-1104
kle@smcgov.org

John Le, City Attorney, *City of East Palo Alto*
2415 University Avenue, East Palo Alto, CA 94303
Phone: (650) 853-5921
jle@cityofepa.org

William Lee, Chief Deputy District Attorney, *County of San Bernardino District Attorney's Office*
303 W. 3rd Street, San Bernardino, CA 92415-0502
Phone: (909) 382-3800
WLee@sbcda.org

Matthew Lee, Public Works Director, *City of San Bruno*
567 El Camino Real, San Bruno, CA 94066
Phone: (650) 616-7065
mlee@sanbruno.ca.gov

Fernando Lemus, Principal Accountant - Auditor, *County of Los Angeles*
Auditor-Controller's Office, 500 West Temple Street, Room 603, Los Angeles, CA 90012
Phone: (213) 974-0324
flemus@auditor.lacounty.gov

Elliott Levitsky, *Zone 7 Water Agency*
100 North Canyons Parkway, Livermore, CA 94551
Phone: (925) 454-5033
elevitsky@zone7water.com

Erika Li, Chief Deputy Director, *Department of Finance*
915 L Street, 10th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
erika.li@dof.ca.gov

Keith Lichten, Division Chief, *San Francisco Bay Regional Water Quality Control Board*
Watershed Management, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2380
klichten@waterboards.ca.gov

Selina Louie, Water Resource Control Engineer, *San Francisco Bay Regional Water Quality Control Board*
1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2383
SLouie@waterboards.ca.gov

Kenneth Louie, Chief Counsel, *Department of Finance*
1021 O. Street, Suite 3110, Sacramento, CA 95814
Phone: (916) 322-0971
Kenny.Louie@dof.ca.gov

Everett Luc, Accounting Administrator I, Specialist, *State Controller's Office*
3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0766
ELuc@sco.ca.gov

Steven Machida, Director, *City of San Carlos*
Public Works, 600 Elm Street, San Carlos, CA 94070
Phone: (650) 802-4203
smachida@cityofsancarlos.org

Jill Magee, Program Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
Jill.Magee@csm.ca.gov

Jennifer Maguire, City Manager, *City of San Jose*
Claimant Contact
200 East Santa Clara Street, San Jose, CA 95113
Phone: (408) 535-8111
Jennifer.Maguire@sanjoseca.gov

Darryl Mar, Manager, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0706
DMar@sco.ca.gov

Debra Margolis, *City of Fremont*
3300 Capitol Avenue, Building A, Fremont, CA 94538
Phone: (510) 284-4030
dmargolis@fremont.gov

Joseph Martinez, Acting Lead, *San Francisco Bay Regional Water Quality Control Board*
1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2304
Joseph.Martinez@Waterboards.ca.gov

Ensen Mason, Auditor-Controller/Treasurer/Tax Collector, *County of San Bernardino*
268 West Hospitality Lane, San Bernardino, CA 92415-0018
Phone: (909) 387-8322
webinfo@sbcountyatc.gov

Steven Mattas, Partner, *Redwood Public Law*
409 13th St., Suite 600, Oakland, CA 94612
Phone: (510) 282-7033
steve.mattas@redwoodpubliclaw.com

Frederick Mayo, Water Utilities Director, *City of Oceanside*
300 N. Coast Highway, Oceanside, CA 92054
Phone: (760) 435-5827
fmayo@oceansideca.org

Michelle Mendoza, *MAXIMUS*
17310 Red Hill Avenue, Suite 340, Irvine, CA 95403
Phone: (949) 440-0845
michellemendoza@maximus.com

Azalea Mitch, Public Works Director, *City of Menlo Park*
701 Laurel Street, Menlo Park, CA 94025
Phone: (650) 330-6692
aamitch@menlopark.gov

Joseph Monical, Water Resource Control Engineer, *San Francisco Bay Regional Water Quality Control Board*
1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2304
Joseph.Monical@Waterboards.ca.gov

Thomas Mumley, Assistant Executive Officer, *San Francisco Bay Regional Water Quality Control Board*
1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2395
thomas.mumley@waterboards.ca.gov

Marilyn Munoz, Senior Staff Counsel, *Department of Finance*
915 L Street, Sacramento, CA 95814
Phone: (916) 445-8918
Marilyn.Munoz@dof.ca.gov

Justin Murphy, City Manager, *City of Menlo Park*
701 Laurel Street, Menlo Park, CA 94025
Phone: (650) 330-6725
jicmurphy@menlopark.gov

Kaleb Neufeld, Assistant Controller, *City of Fresno*
2600 Fresno Street, Fresno, CA 93721
Phone: (559) 621-2489
Kaleb.Neufeld@fresno.gov

Gregory Newmark, Partner, *Duane Morris, LLP*
Claimant Representative
865 South Figueroa Street, Suite 3100, Los Angeles , CA 90017-5450
Phone: (213) 689-7434
gnewmark@duanemorris.com

Andy Nichols, *Nichols Consulting*
1857 44th Street, Sacramento, CA 95819
Phone: (916) 455-3939
andy@nichols-consulting.com

Rebecca Nordenholt, Senior Environmental Scientist, *San Francisco Bay Regional Water Quality Control Board*
Watershed Management, 1515 Clay Street, Suite 1400, 94612, Oakland, CA
Phone: (510) 622-1013
Rebecca.Nordenholt@waterboards.ca.gov

Adriana Nunez, Staff Counsel, *State Water Resources Control Board*
Los Angeles Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 322-3313
Adriana.Nunez@waterboards.ca.gov

Margaret Olaiya, Director of Finance, *County of Santa Clara*
Claimant Contact
70 West Hedding Street, East Wing, 2nd Floor, San Jose, CA 95110
Phone: (408) 299-5201
Margaret.Olaiya@fin.sccgov.org

Erika Opp, Administrative Analyst, *City of St. Helena*
City Clerk, 1480 Main Street, St. Helena, CA 94574
Phone: (707) 968-2743
eopp@cityofsthelena.gov

Eric Oppenheimer, Executive Director, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5615
eric.oppenheimer@waterboards.ca.gov

Celso Ortiz, *City of Oakland*
One Frank Ogawa Plaza, 6th Floor, Oakland, CA 94612
Phone: (510) 238-6236
cortiz@oaklandcityattorney.org

Robert Ovadia, Public Works Director/City Engineer, *Town of Atherton*
80 Fair Oaks Lane, Atherton, CA 94027

Phone: (650) 752-0541
rovadia@ci.atherton.ca.us

Patricia Pacot, Accountant Auditor I, *County of Colusa*
Office of Auditor-Controller, 546 Jay Street, Suite #202 , Colusa, CA 95932
Phone: (530) 458-0424
ppacot@countyofcolusa.org

Arthur Palkowitz, *Law Offices of Arthur M. Palkowitz*
12807 Calle de la Siena, San Diego, CA 92130
Phone: (858) 259-1055
law@artpalk.onmicrosoft.com

Kirsten Pangilinan, Specialist, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 322-2446
KPangilinan@sco.ca.gov

Nisha Patel, Public Works Director, *City of Belmont*
Public Works, 1 Twin Pines Lane, Belmont, CA 94002
Phone: (650) 595-7459
npatel@belmont.gov

Elizabeth Pianca, Deputy County Counsel, *County of Santa Clara*
70 West Hedding Street, East Wing, 9th Floor, San Jose, CA 95110-1770
Phone: (408) 299-5920
elizabeth.pianca@cco.sccgov.org

Thomas Piccolotti, City Manager, *City of Daly City*
333-90th Street, Daly City, CA 94015
Phone: (650) 991-8127
tpiccolotti@dalycity.org

Johnnie Pina, Legislative Policy Analyst, *League of Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8214
jpina@cacities.org

Richard Pio Roda, Partner, *Redwood Public Law*
409 13th St., Suite 600, Oakland, CA 94612
Phone: (510) 877-5845
richard@redwoodpubliclaw.com

Trevor Power, Accounting Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach , CA 92660
Phone: (949) 644-3085
tpower@newportbeachca.gov

Valerie Pryor, General Manager, *Alameda County Flood Control & Water Conservation*
District Zone 7, 100 North Canyons Parkway, Livermore , CA 94551
Phone: (925) 454-5000
vpryor@zone7water.com

Jonathan Quan, Associate Accountant, *County of San Diego*
Projects, Revenue, and Grants Accounting, 5530 Overland Ave, Suite 410, San Diego, CA 92123
Phone: 6198768518
Jonathan.Quan@sdcounty.ca.gov

Veronica Ramirez, *City of Redwood City*
1017 Middlefield Road, Redwood City, CA 94063
Phone: (650) 780-7200
vramirez@redwoodcity.org

Roberta Raper, Director of Finance, *City of West Sacramento*
1110 West Capitol Ave, West Sacramento, CA 95691
Phone: (916) 617-4509
robertar@cityofwestsacramento.org

Prasanna Rasiah, City Attorney, *City of San Mateo*
330 W. 20th Avenue, San Mateo, CA 94403
Phone: (650) 522-7020
CityAttorneysOffice@cityofsanmateo.org

Chad Rinde, Director of Finance, *County of Sacramento*
700 H Street, Room 3650, Sacramento, CA 95814
Phone: (916) 874-7248
RindeC@SacCounty.gov

George Rodericks, City Manager, *Town of Atherton*
91 Ashfield Road, Atherton, CA 94027
Phone: (650) 752-0504
grodericks@ci.atherton.ca.us

Eren Romero, Business Manager, *City of Menlo Park*
Department of Public Works, 701 Laurel Street, Menlo Park, CA 94025-3483
Phone: (650) 330-6755
eromero@menlopark.gov

Michael Roush, *Emergency Services-Marina Services-Public Works*
50 Park Place, Brisbane, CA 94005
Phone: (415) 508-2136
mroush@ci.brisbane.ca.us

Greg Rubens, City Attorney, *City of San Carlos*
600 Elm Street, San Carlos, CA 94070
Phone: (650) 802-4148
grubens@cityofsancarlos.org

Gabriela Ruiz, Associate Engineer, *Town of Atherton*
80 Fair Oaks Lane, Atherton, CA 94027
Phone: (650) 752-0555
gruiz@athertonca.gov

Teresita Sablan, *State Water Resources Control Board*
Santa Ana Regional Water Quality Control Board and San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 341-5174
Teresita.Sablan@waterboards.ca.gov

Office of the San Jose City Attorney, *City of San Jose*
Claimant Representative
Office of the San Jose City Attorney, 200 E. Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1900
cao.main@sanjoseca.gov

Jessica Sankus, Senior Legislative Analyst, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
jsankus@counties.org

James Scanlin, Environmental Compliance Specialist, *County of Alameda*
Public Works, 399 Elmhurst Street, Hayward, CA 94544
Phone: (510) 670-6548
jims@acpwa.org

Cindy Sconce, Director, *Government Consulting Partners*
5016 Brower Court, Granite Bay, CA 95746
Phone: (916) 276-8807
cindysconcecp@gmail.com

Tracy Scramaglia, Assistant Public Works Director, *City of Belmont*
One Twin Pines Lane, Belmont, CA 94002
Phone: (650) 595-7469
jmcneill@sandiego.gov

Carla Shelton, Senior Legal Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
carla.shelton@csm.ca.gov

Camille Shelton, Chief Legal Counsel, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
camille.shelton@csm.ca.gov

Mary Ellen Skramstad, Environmental Compliance Specialist, *City of Berkeley*
Engineering Division, 1947 Center Street., 4th Floor, Berkeley, CA 94704
Phone: (510) 981-6337
mskramstad@cityofberkeley.info

Anthony Smith, Water Resources Manager, *City of Livermore*
Water Resources, 1052 S. Livermore Avenue, Livermore, CA 94550
Phone: (925) 960-8100
awsmith@livermoreca.gov

Daniel Sodergren, City Attorney, *City of Pleasanton*
123 Main Street, Pleasanton, CA 94566
Phone: (925) 931-5018
dsodergren@cityofpleasantonca.gov

Paul Steenhausen, Principal Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, , Sacramento, CA 95814
Phone: (916) 319-8303
Paul.Steenhausen@lao.ca.gov

Ann Stillman, Director of Public Works, *County of San Mateo*
555 County Center, 5th Floor, Redwood City, CA 94063
Phone: (650) 363-4100
astillman@smcgov.org

Louis Sun, Director of Public Works/Town Engineer, *Town of Woodside*
Public Works, PO Box 620005, Woodside, CA 94062

Phone: (650) 851-6790
lsun@woodsideca.gov

Julie Testa, Vice Mayor, *City of Pleasanton*
123 Main Street PO Box 520, Pleasanton, CA 94566
Phone: (925) 872-6517
Jtesta@cityofpleasantonca.gov

Jolene Tollenaar, *MGT Consulting Group*
2251 Harvard Street, Suite 134, Sacramento, CA 95815
Phone: (916) 243-8913
jolenetollenaar@gmail.com

Annie Tom, *County of Santa Clara*
Controller - Treasurer Department, 70 West Hedding Street, East Wing, San Jose, CA 95110
Phone: (408) 299-5265
annie.tom@fin.sccgov.org

Robert Torrez, Interim Chief Financial Officer, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5630
robert.torrez@surfcity-hb.org

Colleen Tribby, Finance Director, *City of Dublin*
Claimant Contact
100 Civic Plaza, Dublin, CA 94568
Phone: (925) 833-6640
colleen.tribby@dublin.ca.gov

Catherina Tsang, Controller-Treasurer Division Manager, *County of Santa Clara*
Controller-Treasurer, 70 West Hedding Street, San Jose, CA 95110
Phone: (408) 299-5216
catherina.tsang@fin.sccgov.org

Jessica Uzarski, Consultant, *Senate Budget and Fiscal Review Committee*
1020 N Street, Room 502, Sacramento, CA 95814
Phone: (916) 651-4103
Jessica.Uzarski@sen.ca.gov

Alejandra Villalobos, Management Services Manager, *County of San Bernardino*
Office of Auditor-Controller, 222 West Hospitality Lane, Forth Floor, San Bernardino, CA 92415
Phone: (909) 382-3191
alejandra.villalobos@sbccountyatc.gov

Nawel Voelker, Acting Director of Finance (Management Analyst), *City of Belmont*
Finance Department, One Twin Pines Lane, Belmont, CA 94002
Phone: (650) 595-7433
nvoelker@belmont.gov

Victor Voong, Associate Engineer, *City of Burlingame*
501 Primrose Road, Burlingame, CA 94010
Phone: (650) 558-7242
vvoong@burlingame.org

Athena Watson, *Zone 7 Water Agency*
100 North Canyons Parkway, Livermore, CA 94551
Phone: (925) 454-5033
athena@zone7water.com

Renee Wellhouse, *David Wellhouse & Associates, Inc.*
3609 Bradshaw Road, H-382, Sacramento, CA 95927
Phone: (916) 797-4883
dwa-renee@surewest.net

Adam Whelen, Director of Public Works, *City of Anderson*
1887 Howard St., Anderson, CA 96007
Phone: (530) 378-6640
awhelen@ci.anderson.ca.us

Eileen White, Executive Officer, *San Francisco Bay Regional Water Quality Control Board*
1515 Clay Street, Suite 1400, Oakland, CA 94612
Phone: (510) 622-2300
Eileen.White@waterboards.ca.gov

Scott Wikstrom, City Engineer, *City of Alameda*
950 West Mall Square, Alameda, CA 94501
Phone: (510) 747-7930
swikstrom@alamedaca.gov

Paul Willis, Director of Public Works, *Town of Hillsborough*
1600 Floribunda Avenue, Hillsborough, CA 94010
Phone: (650) 375-7444
pwillis@hillsborough.net

Yuri Won, Attorney, Office of Chief Counsel, *State Water Resources Control Board*
San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento,
CA 95814
Phone: (916) 327-4439
Yuri.Won@waterboards.ca.gov

Arthur Wylene, General Counsel, *Rural County Representatives of California (RCRC)*
1215 K Street, Suite 1650, Sacramento, CA 95814
Phone: (916) 447-4806
awylene@rcrcnet.org

Elisa Wynne, Staff Director, *Senate Budget & Fiscal Review Committee*
California State Senate, State Capitol Room 5019, Sacramento, CA 95814
Phone: (916) 651-4103
elisa.wynne@sen.ca.gov

Kaily Yap, Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-3274
Kaily.Yap@dof.ca.gov

Siew-Chin Yeong, Director of Public Works, *City of Pleasanton*
3333 Busch Road, Pleasanton, CA 94566
Phone: (925) 931-5506
syeong@cityofpleasantonca.gov

Howard Young, Public Works Director, *City of Newark*
, Newark, CA 94560
Phone: (510) 578-4286
howard.young@newark.org

Traci Young, IS Project Director, *City and County of San Francisco*
San Francisco Public Utilities Commission (SFPUC), 525 Golden Gate Ave, San Francisco, CA

94102

Phone: (415) 653-2583

tmyoung@sflower.org

Stephanie Yu, Assistant Chief Counsel, *State Water Resources Control Board*

Office of Chief Counsel, 1001 I Street, Sacramento, CA 95814

Phone: (916) 341-5157

stephanie.yu@waterboards.ca.gov

Aly Zimmermann, City Manager, *City of Rocklin*

3970 Rocklin Road, Rocklin, CA 95677

Phone: (916) 625-5585

alyz@rocklin.ca.us

Helmholt Zinser-Watkins, Associate Governmental Program Analyst, *State Controller's Office*

Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 700,
Sacramento, CA 95816

Phone: (916) 324-7876

HZinser-watkins@sco.ca.gov