

Adopted: July 26, 2024

STATEWIDE COST ESTIMATE

\$459,106 - \$690,409

Initial Claim Period¹

(June 1, 2009 to December 31, 2017)

*California Regional Water Quality Control Board, Santa Ana Region,
Order No. R8-2009-0030, Sections XI.4, XIII.1, XIII.4, XIII.7, XVIII.B.8, and XVIII.B.9.*

09-TC-03

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate on consent by a vote of 5-0 during a regularly scheduled hearing on July 26, 2024 as follows:

Member	Vote
Lee Adams, County Supervisor	Yes
Shannon Clark, Representative of the Director of the Office of Planning and Research	Yes
Deborah Gallegos, Representative of the State Controller	Yes
Renee Nash, School District Board Member	Yes
William Pahland, Representative of the State Treasurer, Vice Chairperson	Yes
Michelle Perrault, Representative of the Director of the Department of Finance, Chairperson	Absent

STAFF ANALYSIS

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

This Statewide Cost Estimate addresses state-mandated activities arising from National Pollutant Discharge Elimination System (NPDES) Order No. R8-2009-0030, adopted by the Santa Ana Regional Water Quality Control Board on May 22, 2009.

The Commission adopted the Test Claim Decision on March 24, 2023, partially approving reimbursement for permittees that incur increased costs to perform the reimbursable activities under the mandate. The Commission adopted the Decision and Parameters and Guidelines on September 22, 2023. The permittees include the County of Orange, the Orange County Flood Control District, and the cities of Anaheim, Brea,

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).

Buena Park, Costa Mesa, Cypress, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Laguna Hills, Laguna Woods, La Habra, La Palma, Lake Forest, Los Alamitos, Newport Beach, Orange, Placentia, Santa Ana, Seal Beach, Stanton, Tustin, Villa Park, Westminster and Yorba Linda.²

The initial reimbursement period, which is also the entire reimbursement period, is from June 1, 2009, through December 31, 2017 (the last month of 2008-2009 through first half of 2017-2018).³ Eligible claimants were required to file initial claims with the State Controller's Office (Controller) by April 25, 2024. Late initial reimbursement claims may be filed until April 25, 2025, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.⁴

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

- A. Submit a proposed Cooperative Watershed Program that will fulfill applicable requirements of the selenium TMDL implementation plan within 24 months of adoption of the test claim permit, or one month after approval of the Regional Board selenium TMDLs by the Office of Administrative Law (OAL), whichever is later. (Order No. R8-2009-0030, Section XVIII.B.8.)
- B. Develop a "constituent-specific source control plan" for copper, lead, and zinc, including a monitoring program, to ensure compliance" with WLAs [waste load allocations] for dry and wet weather runoff, which were derived from the 2007 San Gabriel River Metals TMDL jointly developed by the Los Angeles Water Board and U.S. EPA. (Order No. R8-2009-0030, Section XVIII.B.9.)⁵
- C. Public education program:
 1. By July 1, 2012, the one-time activity to complete a public awareness survey to determine the effectiveness of the current public and business education strategy, and to include the findings of the survey and any proposed changes to the current program in the annual report for 2011-2012. (Order No. R8-2009-0030, Section XIII.1.)

² Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, pages 6, 16.

³ Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, pages 5, 14.

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

⁵ According to the permit, Activity B. applies to the permittees "with discharges to Coyote Creek or the San Gabriel River" and must be completed within 12 months of the date of permit adoption. Exhibit C (4), Regional Water Quality Control Board, Order No. R8-2009-0030, page 73 (test claim permit).

2. Permittees shall administer individual or regional workshops for each of the specified sectors (manufacturing facilities; mobile service industry; commercial, distribution, and retail sales industry; residential/commercial landscape construction and service industry; residential and commercial construction industry; and residential and community activities) by July 1, 2010 and annually thereafter. (Order No. R8-2009-0030, Section XIII.4.)
 3. The principal permittee, in collaboration with the co-permittees, shall develop and implement a mechanism for public participation in the updating and implementation of DAMPs, WQMP guidance, and Fact Sheets for “various activities.” The public shall be informed of the availability of these documents through public notices in local newspapers, County or city websites, local libraries, city halls, or courthouses. (Order No. R8-2009-0030, Section XIII.7.)
- D. Within 18 months of adoption, develop a pilot program to control pollutant discharges from common interest areas and areas managed by homeowner associations or management companies. (Order No. R8-2009-0030, Section XI.4.)⁶

Offsetting Revenues and Reimbursements

The Parameters and Guidelines specify that any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant’s proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.⁷

Offsetting revenues identified in the reimbursement claims totaled \$449,920 for fiscal years 2008-2009 through 2010-2011, and 2012-2013 through 2016-2017 (no claims were filed for 2011-2012 or 2017-2018). Only the County of Orange identified offsetting revenue but did not disclose its source.⁸

Statewide Cost Estimate

All activities except for C.2., and C.3., are one-time activities and end within the first few years of the program. Therefore, all costs for Activities A., B., C.1., and D., are expected to be claimed for the first few years of the reimbursement period only. Costs for Activity C.2., however, are expected to be claimed for the entire reimbursement

⁶ Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, pages 15-16.

⁷ Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, page 19.

⁸ Exhibit C (6), Spreadsheet of Claims Data.

period ending December 31, 2017. As explained below, although Activity C.3. is ongoing, costs are only expected to be claimed for the first couple years of the reimbursement period.

Staff reviewed 53 unaudited reimbursement claims submitted by 12 city claimants and Orange County, as compiled by the Controller. Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein. Table 1 below summarizes the cost estimates for all fiscal years, 2008-2009 to 2016-2017.

Table 1. Reimbursement Period Cost Estimate

Activity A. Submit a proposed Cooperative Watershed Program that will fulfill applicable requirements of the selenium TMDL implementation plan within 24 months of adoption of the test claim permit, or one month after approval of the Regional Board selenium TMDLs by OAL (April 19, 2019), ⁹ whichever is later.	\$513,282- \$627,344
Activity B. Develop a “constituent-specific source control plan” for copper, lead, and zinc, including a monitoring program, to ensure compliance” with WLAs for dry and wet weather runoff, which were derived from the 2007 San Gabriel River Metals TMDL jointly developed by the Los Angeles Water Board and U.S. EPA.	\$72,578 - \$114,914
Activity C.1. By July 1, 2012, complete a public awareness survey to determine the effectiveness of the current public and business education strategy, and include the findings of the survey and any proposed changes to the current program in the annual report for 2011-2012.	\$110,310 - \$237,585
Activity C.2. Administer individual or regional workshops for each of the specified sectors (manufacturing facilities; mobile service industry; commercial, distribution, and retail sales industry; residential/commercial landscape construction and service industry; residential and commercial construction industry; and residential and community activities) by July 1, 2010, and annually thereafter.	\$177,238 - \$381,748
Activity C.3. The principal permittee, in collaboration with the co-permittees, shall develop and implement a mechanism for public participation in the updating and implementation of DAMPs, WQMP guidance, and Fact	\$623 - \$1,455

⁹ The OAL approval date of April 19, 2019, is in the history of California Code of Regulations, title 23, section 3979.11.

Sheets for various activities. The public shall be informed of the availability of these documents through public notices in local newspapers, County or city websites, local libraries, city halls, or courthouses.	
Activity D. Within 18 months of adoption, develop a pilot program to control pollutant discharges from common interest areas and areas managed by homeowner associations or management companies.	\$17,256 - \$53,679
Indirect Costs identified	\$17,739 - \$28,601
Offsetting Revenue	\$449,920 - \$727,789
Late Filing Penalty	\$0 - \$27,128
Total Costs	\$459,106 - \$690,409

Assumptions

1. Except for Activities C.2., and C.3., all of the approved activities are one-time activities and therefore most costs are expected to be claimed only for the first few years of the reimbursement period.

- a. Activity A. requires the permittees to submit a proposed Cooperative Watershed Program that will fulfill applicable requirements of the selenium TMDL implementation plan within 24 months of adoption of the test claim permit, or one month after approval of the Regional Board selenium TMDLs by OAL (April 19, 2019),¹⁰ whichever is later. All the claims for this activity were filed for the first three fiscal years of the claiming period, 2008-2009 to 2010-2011,¹¹ (The reimbursement period includes only June of fiscal year 2008-2009).

The selenium TMDL for the Cooperative Watershed Program applies to the following permittees: the County of Orange, Orange County Flood Control District (OCFCD), and the cities of Irvine, Laguna Hills, Laguna Woods, Lake Forest, Newport Beach, Orange, Tustin, and Santa Ana that discharge to the San Diego Creek Subwatershed; and the County of Orange, OCFCD, and the cities of Costa Mesa, Santa Ana and Newport Beach for the Santa Ana-Delhi Channel.¹²

¹⁰ The OAL approval date of April 19, 2019, is in the history of California Code of Regulations, title 23, section 3979.11.

¹¹ Exhibit C (6), Spreadsheet of Claims Data.

¹² Exhibit C (5), Regional Water Quality Control Board, Santa Ana Region, Excerpts of the Santa Ana River Basin Plan,

The claimants for Activity A. are the cities of Costa Mesa, Irvine, Laguna Hills, Laguna Woods, Lake Forest, Orange, Tustin, Newport Beach, and Orange County.¹³ Therefore, the high estimate assumes only the remaining two permittees subject to the TMDL will file claims (Santa Ana and the OCFCD).

- b. Activity B. requires the permittees to develop a “constituent-specific source control plan” for copper, lead, and zinc to ensure compliance” with WLAs for dry and wet weather runoff. The plan, which was due “within 12 months of permit adoption” (by May 22, 2010),¹⁴ included a monitoring program and was derived from waste load allocations in the 2007 San Gabriel River Metals TMDL jointly developed by the Los Angeles Water Board and U.S. EPA. According to the 2015-2016 Annual Progress Report and Program Effectiveness Assessment, this source control plan was finalized in June 2010.¹⁵ The reimbursement claims for Activity B. were all filed for fiscal year 2009-2010 only,¹⁶ and since this one-time activity was completed there are no other years for which to claim.

The workgroup of watershed cities that developed the Activity B. source control plan consisted of Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Placentia, Seal Beach and Orange County.¹⁷ However according to the permit, Activity B. applies to the permittees “with discharges to Coyote Creek or the San Gabriel River.”¹⁸ The TMDL lists the following permittee cities in the Coyote Creek basin: Anaheim, Brea, Buena

https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/docs/2019/New/Chapter_6_June_2019.pdf (accessed on May 24, 2024), pages 6-88 to 6-89.

¹³ Exhibit C (6), Spreadsheet of Claims Data.

¹⁴ The test claim permit was *adopted* by the Regional Board on May 22, 2009, but had a later effective date of June 1, 2009. Exhibit C (4), Regional Water Quality Control Board, Order No. R8-2009-0030, page 82 (test claim permit).

¹⁵ Exhibit C (2), Commission on State Mandates, Test Claim Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII, Adopted May 22, 2009*, 09-TC-03, adopted March 24, 2023, <https://csm.ca.gov/decisions/09-tc-03-032423.pdf> (accessed on January 9, 2024), page 105.

¹⁶ Exhibit C (6), Spreadsheet of Claims Data.

¹⁷ Exhibit C (2), Commission on State Mandates, Test Claim Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII, Adopted May 22, 2009*, 09-TC-03, adopted March 24, 2023, <https://csm.ca.gov/decisions/09-tc-03-032423.pdf> (accessed on January 9, 2024), page 105.

¹⁸ Exhibit C (4), Regional Water Quality Control Board, Order No. R8-2009-0030, page 73 (test claim permit).

Park, Cypress, Fullerton, Garden Grove, La Habra, La Palma, Los Alamitos, Placentia, Yorba Linda; and the following permittee cities in the San Gabriel River Basin (reaches 1 to 5): Garden Grove, Los Alamitos, and Seal Beach.¹⁹

For Activity B. the following claimants submitted reimbursement claims: the cities of Anaheim, Buena Park, Costa Mesa, Fullerton, Irvine, Laguna Hills, Laguna Woods, Lake Forest, Orange (city), Tustin, Westminster, and Orange County.²⁰ Some of these claimants participated in the workgroup to create the plan, but it is unclear what role claimants who filed initial claims but did not participate in the workgroup had in preparing the plan. The approved activity is only to create the plan but not to implement it.²¹

The high estimate assumes, in addition to the local agencies that already claimed reimbursement for Activity B., only the seven permittees subject to the TMDL who participated in the workgroup but did not already claim (Brea, Cypress, La Habra, La Palma, Los Alamitos, Placentia, and Seal Beach) will claim reimbursement.

- c. Activity C.1. (public awareness survey) was to be completed by July 1, 2012. The Annual Progress Report and Program Effectiveness Assessment indicates the survey was conducted in May 2012.²² All costs for one-time Activity C.1. were claimed for 2009-2010 and 2010-2011, with 96 percent of costs claimed (\$105,792 of \$110,310) for 2009-2010. It is assumed that this activity was completed in 2010-2011 and no costs for it will be claimed for fiscal years after fiscal year 2010-2011.
- d. Activity D. (develop a pilot program to control pollutant discharges from common interest areas and areas managed by homeowner associations or management companies) was due within 18 months of permit adoption (by Nov. 22, 2010). Costs for Activity D. were claimed for 2010-2011, 2012-2013,

¹⁹ Exhibit C (8), U.S. EPA, Region IX, Total Maximum Daily Load for Metals and Selenium, San Gabriel River and Impaired Tributaries, March 26, 2007, https://www.waterboards.ca.gov/losangeles/water_issues/programs/tmdl/Established/San%20Gabriel%20River%20Metals%20TMDL/final_sangabriel_metaltmdl_3-27-07.pdf (accessed on January 8, 2024), page 53.

²⁰ It is unclear why non-workgroup and non-TMDL cities (Costa Mesa, Irvine, Laguna Hills, Laguna Woods, Lake Forest, Tustin, Westminster) claimed costs for Activity B.

²¹ Exhibit C (2), Commission on State Mandates, Test Claim Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII, Adopted May 22, 2009*, 09-TC-03, adopted March 24, 2023, <https://csm.ca.gov/decisions/09-tc-03-032423.pdf> (accessed on January 9, 2024), page 114.

²² Exhibit C (7), Unified Annual Progress Report, Program Effectiveness Assessment, November 15, 2017, Section C-6.0, page C-6-15.

2013-2014, and 2014-2015, with 81 percent of the costs claimed for 2010-2011. Therefore, since the pilot program appears to have been completed, it is assumed no costs will be claimed for fiscal years after 2014-2015.

2. It is assumed ongoing costs for Activity C.2. will continue to be claimed for the entire reimbursement period, ending December 31, 2017. However, no additional costs are expected to be claimed for continuing Activity C.3., because costs for that activity were only claimed for the first couple years of the reimbursement period.
 - a. Activity C.2., to administer individual or regional workshops for each of the specified sectors (manufacturing facilities; mobile service industry; commercial, distribution, and retail sales industry; residential/commercial landscape construction and service industry; residential and commercial construction industry; and residential and community activities) by July 1, 2010 and annually thereafter continues throughout the reimbursement period and is assumed to make up all of the costs claimed for fiscal year 2015-2016 through the first half of fiscal year 2016-2017 (until December 31, 2017), other than minor indirect costs.
 - b. Activity C.3. requires the principal permittee, in collaboration with the co-permittees, to develop and implement a mechanism for public participation in the updating and implementation of DAMPs, WQMP guidance, and Fact Sheets for various activities. The public shall be informed of the availability of these documents through public notices in local newspapers, County or city websites, local libraries, city halls, or courthouses. All claims for Activity C.3. were filed only for 2008-2009 and 2009-2010, so no costs for other fiscal years are expected to be claimed.
3. Consistent with the assumptions for the one-time activities A., B., C.1., and D., discussed above, the vast majority of costs claimed were for the first three fiscal years of the permit: 2008-2009, 2009-2010, and 2010-2011. The initial claims indicate that 86 percent of the total costs claimed (\$392,860 of \$459,106, net of offsets) are for fiscal years 2008-2009 through 2010-2011.
4. Activities A. and B. apply to only a subset of the permittees, so it is assumed only that subset of permittees will claim for those Activities.
5. The amount claimed for the period of reimbursement may also be higher if late or amended claims are filed. Only 13 of 28 eligible claimants (46 percent) filed claims for the reimbursement period.²³ The remaining 15 eligible claimants may still file late claims, and the 13 claimants who timely filed may file amended claims for additional costs.
6. As indicated by the claims filed, most or all the cities' claimed costs are for contracted services because the permit designated the County of Orange as the

²³ Exhibit C (6), Spreadsheet of Claims Data.

principal permittee and the city claimants paid the principal permittee for services under a cost sharing agreement. The County of Orange may only claim for its own expenses and not those incurred on behalf of the city claimants.²⁴

7. Costs may be lower if offsetting revenue was used by a claimant to pay for the reimbursement activities. The Test Claim Decision recognizes various types of non-tax revenue that could be offset,²⁵ and the Parameters and Guidelines state offsets include but are not limited to “state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant’s proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.”²⁶ Only the County of Orange identified offsetting revenue of \$449,920 for fiscal years 2008-2009 through 2010-2011, and 2012-2013 through 2016-2017 (no claims were filed by any local agencies for 2011-2012 or 2017-2018). The County did not disclose the source of revenue, but according to its Program Effectiveness Assessment for 2015-2016, its revenue sources for stormwater (other than General Fund) include: a separate utility billing item, gas tax, and special district funds, such as a sanitation fee, fleet maintenance fund, grants, pollution response cost recovery, and other service fees and fines.²⁷ Also, reimbursements from other local agencies under the cost sharing agreement are not the County’s proceeds of taxes and may account for the County’s claimed offsetting revenue.

Although the City of Lake Forest identified grant funding received in fiscal year 2012-2013 for two percent of its costs,²⁸ and for fiscal years 2014-2015 and 2015-2016 received grant funding for eight percent of its costs,²⁹ it did not file

²⁴ Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, pages 12-14.

²⁵ Exhibit C (2), Commission on State Mandates, Test Claim Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII, Adopted May 22, 2009*, 09-TC-03, adopted March 24, 2023, <https://csm.ca.gov/decisions/09-tc-03-032423.pdf> (accessed on January 9, 2024), pages 198, 199-204.

²⁶ Exhibit A, Decision and Parameters and Guidelines, adopted September 22, 2023, page 18.

²⁷ Exhibit C (3), County of Orange and Orange County Flood Control District, Annual Progress Report, Program Effectiveness Assessment, November 15, 2016, Section C-2.0, page C-2-7.

²⁸ Exhibit C (1), Claimant’s Comments on the Draft Proposed Decision, filed November 4, 2022, <https://csm.ca.gov/matters/09-TC-03/doc85.pdf> (accessed on January 9, 2024), page 221.

²⁹ Exhibit C (1), Claimants’ Comments on the Draft Proposed Decision, filed November 4, 2022, <https://csm.ca.gov/matters/09-TC-03/doc85.pdf> (accessed on January 9, 2024), pages 225, 229. See also Exhibit C (2), Commission on State

claims for 2012-2013 or 2015-2016, and did not identify any offsetting revenue in its 2014-2015 claim.³⁰

8. Actual costs may be lower if the Controller reduces any reimbursement claim for this program following an audit deeming the claim to be excessive, unreasonable, or not eligible for reimbursement.

Methodology

A. Reimbursement Period Cost Estimate

Activity A. consists of submitting a proposed Cooperative Watershed Program that will fulfill applicable requirements of the selenium TMDL implementation plan within 24 months of adoption of the test claim permit (by May 22, 2011), or one month after approval of the Regional Board selenium TMDLs by OAL (April 19, 2019),³¹ whichever is later. Consistent with the assumptions above, the estimate includes only the three fiscal years 2008-2009 to 2010-2011. The low estimate is costs actually claimed. The high estimate adds two more claimants (Santa Ana and the OCFCD) that are subject to the selenium TMDL. Activity A. claims are calculated by using the average costs claimed multiplied by the two eligible claimants that have not yet filed claims.

Activity A. actual costs claimed [\$513,282] / the number of filers [9] = average Activity A. cost per filer [\$57,031]

Average Activity A. cost per filer [\$57,031] x number of non-filers [2] = total estimated non-filer Activity A. costs [\$114,062]

Activity A. actual costs claimed [\$513,282] + estimated non-filer Activity A. costs that could be claimed in late claims [\$114,062] = Total potential Activity A. costs [\$627,344]

Activity B., consists of developing a “constituent-specific source control plan” for copper, lead, and zinc, including a monitoring program, to ensure compliance” with WLAs for dry and wet weather runoff, which were derived from the 2007 San Gabriel River Metals TMDL jointly developed by the Los Angeles Water Board and U.S. EPA. Consistent with the assumptions described above, the high estimate assumes that, in addition to the local agencies that already claimed reimbursement for Activity B., the seven permittees subject to the TMDL and that participated in the workgroup to develop the plan, but did not already claim (Brea, Cypress, La Habra, La Palma, Los Alamitos,

Mandates, Test Claim Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII, Adopted May 22, 2009, 09-TC-03*, adopted March 24, 2023, <https://csm.ca.gov/decisions/09-tc-03-032423.pdf> (accessed on January 9, 2024), pages 199-204.

³⁰ Exhibit C (6), Spreadsheet of Claims Data.

³¹ The OAL approval date of April 19, 2019 is in the history of California Code of Regulations, title 23, section 3979.11.

Placentia, and Seal Beach), will claim reimbursement. This is calculated by using the average costs claimed multiplied by the seven eligible claimants who have not yet filed claims. Then add the actual claims to the average claim times the seven claimants who did not file claims. The low estimate is for only costs claimed. The high estimate assumes all claimants who participated in the workgroup will file a claim for this activity.

Activity B. actual costs claimed [\$72,578] / the number of filers [12] = average cost per filer [\$6,048]

Average Activity B. cost per filer [\$6,048] x number of non-filers [7] = total estimated non-filer Activity B. costs [\$42,336]

Activity B. actual costs claimed [\$72,578] + estimated non-filer costs that could be claimed in late claims [\$42,336] = Total potential Activity B. costs [\$114,914]

Costs for Activity C.1. consist of the one-time activity to complete a public awareness survey to determine the effectiveness of the current public and business education strategy by July 1, 2012, and to include the findings of the survey and any proposed changes to the current program in the annual report for 2011-2012. This is calculated by using the average costs claimed multiplied by the 15 eligible claimants who have not yet filed claims. Then add the actual claims to the average claim times the 15 claimants who did not file claims. The low estimate is for only costs claimed. The high estimate assumes all eligible claimants will file a claim for Activity C.1.

Activity C.1. actual costs claimed [\$110,310] / the number of filers [13] = average Activity C.1. cost per filer [\$8,485]

Average Activity C.1. cost per filer [\$8,485] x number of non-filers [15] = total estimated non-filer Activity C.1. costs [\$127,275]

Activity C.1. actual costs claimed [\$110,310] + estimated non-filer Activity C.1. costs that could be claimed in late claims [\$127,275] = Total potential Activity C.1. costs [\$237,585]

Activity C.2. consists of administering individual or regional workshops for each of the specified sectors (manufacturing facilities; mobile service industry; commercial, distribution, and retail sales industry; residential/commercial landscape construction and service industry; residential and commercial construction industry; and residential and community activities) by July 1, 2010, and annually thereafter. Activity C.2. is calculated by using the average costs claimed multiplied by the number of eligible claimants who have not yet filed claims. Then add the actual claims to the average claim times the number of claimants who did not file claims. The low estimate is for only costs claimed. The high estimate assumes all eligible claimants will file a claim for this activity.

Activity C.2. actual costs claimed [\$177,238] / the number of filers [13] = average Activity C.2. cost per filer [\$13,634]

Average Activity C.2. cost per filer [\$13,634] x number of non-filers [15] = total estimated non-filer Activity C.2. costs [\$204,510]

Activity C.2. actual costs claimed [\$177,238] + estimated non-filer Activity C.2. costs that could be claimed in late claims [\$204,510] = Total potential Activity C.2. costs [\$381,748]

Activity C.3. consists of the principal permittee, in collaboration with the co-permittees, developing and implementing a mechanism for public participation in the updating and implementation of DAMPs, WQMP guidance, and Fact Sheets for various activities. The public shall be informed of the availability of these documents through public notices in local newspapers, county or city websites, local libraries, city halls, or courthouses. Activity C.3. is calculated by using the average costs claimed multiplied by the number of eligible claimants who have not yet filed claims. Then add the actual claims to the average claim times the number of claimants who did not file claims. The low estimate is for only costs claimed. The high estimate assumes all eligible claimants will file a claim for this activity.

Activity C.3. actual costs claimed [\$623] / the number of filers [12] = average Activity C.3. cost per filer [\$52]

Average Activity C.3. cost per filer [\$52] x number of non-filers [16] = total estimated non-filer Activity C.3. costs [\$832]

Activity C.3. actual costs claimed [\$623] + estimated non-filer Activity C.3. costs that could be claimed in late claims [\$832] = Total potential Activity C.3. costs [\$1,455]

Activity D. consists of, within 18 months of permit adoption (by November 22, 2010), developing a pilot program to control pollutant discharges from common interest areas and areas managed by homeowner associations or management companies. This is calculated by using the average costs claimed multiplied by the number of eligible claimants who have not yet filed claims. Then add the actual claims to the average claim times the number of claimants who did not file claims. The low estimate is for only costs claimed. The high estimate assumes all eligible claimants will file a claim for this activity.

Activity D. actual costs claimed [\$17,256] / the number of filers [9] = average Activity D. cost per filer [\$1,917]

Average Activity D. cost per filer [\$1,917] x number of non-filers [19] = total estimated non-filer Activity D. costs [\$36,423]

Activity D. actual costs claimed [\$17,256] + estimated non-filer Activity D. costs that could be claimed in late claims [\$36,423] = Total potential Activity D. costs [\$53,679]

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 the average indirect cost rate (as a percentage). Then multiply the average indirect cost rate by the estimated direct costs.

Indirect Costs Actually Claimed [\$17,739] / Direct Costs Actually Claimed [\$909,026] = Average Indirect Cost Rate [2%].

Indirect Cost Rate [2%] x Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [\$1,430,036] = High End of the Estimated Indirect Costs [\$28,601].

Offsetting Revenues: The low end of the range for offsetting revenues is the total amount of offsetting revenues actually claimed. The high end assumes that all eligible claimants will file claims, with offsetting revenues reported by all eligible claimants at the same average rate, and is calculated by dividing the offsetting revenue identified by the actual direct and indirect costs to get the offsetting revenue as a percentage of total costs claimed. Multiply the rate by the estimated direct and indirect costs not claimed. Then add the estimated offsetting revenue for non-filing claimants to the offsetting revenue actually claimed.

Actual Offsetting Revenues [\$449,920] / Actual Direct and Indirect Costs [\$909,026] = Offsetting Rate (offsetting revenues as a percentage of total costs claimed) [49%].

Estimated Non-filer Direct and Indirect Costs [\$567,080] x Offsetting Rate [49%] = Non-filer Offsetting Revenues [\$277,869].

Actual Offsetting Revenues [\$449,920] + Non-filer Offsetting Revenues [\$277,869] = High End of Estimated Offsetting Revenues [\$727,789]

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

Estimated Non-filer Direct and Indirect Costs [\$531,923] – Estimated Non-filer Offsets [\$260,642] = Estimated Non-filer Net Costs [\$271,281].

Estimated Non-filer Net Costs [\$271,281] x (10% late filing penalty) = Estimated Non-filer Late Filing Penalties [\$27,128].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties [\$27,128] = High End of Estimated Late Filing Penalties [\$27,128].

Draft Proposed Statewide Cost Estimate

On June 17, 2024, Commission staff issued the Draft Proposed Statewide Cost Estimate.³² No comments were filed on the Draft Proposed Statewide Cost Estimate.

³² Exhibit B, Draft Proposed Statewide Cost Estimate, issued June 17, 2024.

Conclusion

On July 26, 2024, the Commission adopted this Statewide Cost Estimate of \$459,106 to \$690,409 for the Initial Claim Period that began on June 1, 2009, and ended 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 August 1, 2024, I served the:

- **Current Mailing List dated July 22, 2024**
- **Statewide Cost Estimate adopted July 26, 2024**

*California Regional Water Quality Control Board, Santa Ana Region,
Order No. R8-2009-0030, Sections XI.4, XIII.1, XIII.4, XIII.7, XVIII.B.8, and
XVIII.B.9, Adopted May 22, 2009, 09-TC-03*

Santa Ana Regional Water Quality Control Board, Resolution No. R8-2009-0030,
adopted May 22, 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 August 1, 2024, 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: 7/22/24

Claim Number: 09-TC-03

Matter: California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and, XVIII, Adopted May 22, 2009

Claimants: City of Anaheim
City of Brea
City of Buena Park
City of Costa Mesa
City of Cypress
City of Fountain Valley
City of Fullerton
City of Huntington Beach
City of Irvine
City of Lake Forest
City of Newport Beach
City of Placentia
City of Seal Beach
City of Villa Park
County of Orange
Orange County Flood Control District

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

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

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

Rachelle Anema, *Division Chief, 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
lappgar@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

Damien Arrula, City Administrator, *City of Placentia*
Claimant Contact
401 E. Chapman Avenue, Placentia, CA 92870
Phone: (714) 993-8171
darrula@placentia.org

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

Ryan Baron, *Best Best & Krieger LLP*
18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612
Phone: (949) 263-2600
ryan.baron@bbkllaw.com

Gretchen Beatty, Acting City Manager, *City of Fullerton*
Claimant Contact
303 W. Commonwealth Ave, Fullerton, CA 92832
Phone: (714) 738-6310
citymanager@cityoffullerton.com

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

Baron Bettenhausen, Deputy City Attorney, *Jones & Mayer Law Firm*
3777 N. Harbor Blvd, Fullerton, CA 92835
Phone: (714) 446-1400
bjb@jones-mayer.com

Cindy Black, City Clerk, *City of St. Helena*
1480 Main Street, St. Helena, CA 94574
Phone: (707) 968-2742
ctzafopoulos@cityofstheleena.org

Lisa Bond, *Richards, Watson & Gershon, LLP*
355 South Grand Avenue, 40th Floor, Los Angeles, CA 90071-3101
Phone: (213) 626-8484
lbond@rwglaw.com

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

Katharine Bramble, Attorney, *State Water Resources Control Board*
Santa Ana Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814

Phone: (916) 440-7769
Katharine.Bramble@waterboards.ca.gov

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

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

Shelby Burguan, Budget Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3085
sburguan@newportbeachca.gov

David Burhenn, *Burhenn & Gest, LLP*
Claimant Representative
12401 Wilshire Blvd, Suite 200, Los Angeles, CA 90025
Phone: (213) 629-8788
dburhenn@burhenngest.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

Teresa Calvert, Program Budget Manager, *Department of Finance*
915 L Street, 8th Floor, Sacramento, CA 95814
Phone: (916) 322-2263
Teresa.Calvert@dof.ca.gov

Sheri Chapman, General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8267
schapman@calcities.org

Oliver Chi, City Manager, *City of Irvine*
Claimant Contact
One Civic Center Plaza, Irvine, CA 92623-9575
Phone: (949) 724-6246
OChi@cityofirvine.org

Annette Chinn, *Cost Recovery Systems, Inc.*
705-2 East Bidwell Street, #294, Folsom, CA 95630
Phone: (916) 939-7901
achinnrcs@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

Tim Corbett, Deputy Director of Public Works, *County of Orange*
Public Works, 2301 North Glassell Street, Orange, CA 92865
Phone: (714) 955-0630
tim.corbett@ocpw.ocgov.com

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

Kalyn Dean, 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
kdean@counties.org

Margaret Demauro, Finance Director, *Town of Apple Valley*
14955 Dale Evans Parkway, Apple Valley, CA 92307
Phone: (760) 240-7000
mdemauro@applevalley.org

Douglas Dennington, Attorney, *Rutan & Tucker, LLP*
611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626
Phone: (714) 641-5100
ddennington@rutan.com

Paul Emery, City Manager, *City of Anaheim*
Claimant Contact
200 S. Anaheim Blvd., Suite 733, Anaheim, CA 92805
Phone: (714) 765-5162
pemery@anaheim.net

Donna Ferebee, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-8918
donna.ferebee@dof.ca.gov

Adam Fischer, *Santa Ana Regional Water Quality Control Board*
3737 Main Street, Suite 500, Riverside, CA 92501
Phone: (951) 320-6363
afischer@waterboards.ca.gov

Tim Flanagan, Office Coordinator, *Solano County*
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

Aaron France, City Manager, *City of Buena Park*
Claimant Contact
6650 Beach Boulevard, Second Floor, Buena Park, CA 90621
Phone: (714) 562-3550
afrance@buenapark.com

Steve Franks, City Manager, *City of Villa Park*
Claimant Contact
17855 Santiago Blvd, Villa Park, CA 92861
Phone: (714) 998-1500
sfranks@villapark.org

Bill Gallardo, City Manager, *City of Brea*
Claimant Contact
1 Civic Center Circle, Brea, CA 92821
Phone: (714) 990-7710
billga@cityofbrea.net

Michael Gates, City Attorney, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5538
Michael.Gates@surfcity-hb.org

Howard Gest, *Burhenn & Gest, LLP*
12401 Wilshire Blvd, Suite 200, Los Angeles, CA 90025
Phone: (213) 629-8787
hgest@burhenngest.com

Nicholas Ghirelli, Attorney, *Richards Watson Gershon*
355 South Grand Avenue, Suite 4000, Los Angeles, CA 90071-3101
Phone: (213) 626-8484
Nghirelli@rwglaw.com

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

Soumelia Gountoumas, Environmental Services Administrator, *City of Fountain Valley*
Public Works, 10200 Siater Avenue, Fountain Valley, CA 92708-4736
Phone: (714) 593-4441
soumelia.gountoumas@fountainvalley.gov

Peter Grant, City Manager, *City of Cypress*
Claimant Contact
5275 Cypress Ave, Cypress, CA 90630
Phone: (714) 229-6700
pgrant@cypressca.org

Catherine George Hagan, Senior Staff Counsel, *State Water Resources Control Board*
c/o San Diego Regional Water Quality Control Board, 2375 Northside Drive, Suite 100, San Diego,
CA 92108

Phone: (619) 521-3012
catherine.hagan@waterboards.ca.gov

Kimberly Hall-Barlow, *Jones and Mayer*
3777 N. Harbor Blvd., Fullerton, CA 92835-1366
Phone: (714) 754-5399
khh@jones-mayer.com

Heather Halsey, Executive Director, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
heather.halsey@csm.ca.gov

Andrew Hamilton, Auditor-Controller, *County of Orange*

Claimant Contact

1770 North Broadway, Santa Ana, CA 92706
Phone: (714) 834-2450
Andrew.Hamilton@ac.ocgov.com

Sunny Han, Chief Financial Officer, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5630
Sunny.Han@surfcity-hb.org

Aaron Harp, *City of Newport Beach*
Office of the City Attorney, 100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3131
aharp@newportbeachca.gov

Tom Hatch, City Manager, *City of Costa Mesa*

Claimant Contact

77 Fair Drive, Costa Mesa, CA 92626
Phone: (714) 754-5000
thomas.hatch@costamesaca.gov

Tom Herbel, City Engineer, *City of Huntington Beach*
Public Works Department, 2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 375-5077
Tom.Herbel@surfcity-hb.org

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

Michael Ho, Director of Public Works, *City of Brea*
545 Berry St., Brea, CA 92821
Phone: (714) 990-7691
michaelh@ci.brea.ca.us

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

Travis Hopkins, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648

Phone: (714) 536-5437
THopkins@surfcity-hb.org

Brian Ingallinera, Environmental Services Coordinator, *City of Brea*
1 Civic Center Circle, Brea, CA 92821
Phone: (714) 990-7672
briani@cityofbrea.net

Jill Ingram, City Manager, *City of Seal Beach*
Claimant Contact
211 8th Street, Seal Beach, CA 90740
Phone: (562) 431-2527
jingram@sealbeachca.gov

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

Jayne Joy, Executive Officer, *Santa Ana Regional Water Quality Control Board*
3737 Main Street, Suite 500, Riverside, CA 92501-3348
Phone: (951) 782-3284
Jayne.Joy@waterboards.ca.gov

Jeremy Jungreis, Partner, *Rutan & Tucker, LLP*
611 Anton Boulevard, 14th Floor, Costa Mesa, CA 92626
Phone: (714) 641-5100
jjungreis@rutan.com

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

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

Claudia Landeras-Sobaih, Principal Plan Check Engineer, *City of Irvine*
One Civic Center Plaza, PO Box 19575, Irvine, Irvin 92623
Phone: (949) 724-6330
CLanderas-Sobaih@cityofirvine.org

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

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

Maggie Le, City Manager, *City of Fountain Valley*
Claimant Contact
10200 Slater Avenue, Fountain Valley, CA 92708
Phone: (714) 593-4410
Maggie.Le@fountainvalley.org

Candice Lee, *Richards, Watson & Gershon, LLP*
355 South Grand Avenue, 40th Floor, Los Angeles, CA 90071
Phone: (213) 626-8484
clee@rwglaw.com

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

Grace Leung, City Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3001
gleung@newportbeachca.gov

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 Linker, *City of Anaheim*
Public Works, 200 S. Anaheim Boulevard, Anaheim, CA 92805
Phone: (714) 765-5148
KLinker@anaheim.net

Thomas Lo, Water Quality Administrator, *City of Irvine*
One Civic Center Plaza, PO Box 19575, Irvine, CA 92623
Phone: (949) 724-6315
tlo@cityofirvine.org

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

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

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

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

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

Jim Merid, Environmental Services Manager, *City of Huntington Beach*
Public Works Department, 2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 374-1548
JMerid@surfcity-hb.org

Mina Mikhael, Interim Director of Public Works, *City of Buena Park*
6650 Beach Boulevard, Buena Park, CA 90621
Phone: (714) 562-3670
mmikhael@buenapark.com

Andre Monette, Partner, *Best Best & Krieger, LLP*
2000 Pennsylvania NW, Suite 5300, Washington, DC 20006
Phone: (202) 785-0600
andre.monette@bbkllaw.com

Jill Moya, Financial Services Director, *City of Oceanside*
300 North Coast Highway, Oceanside, CA 92054
Phone: (760) 435-3887
jmoya@oceansideca.org

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

Steve Myrter, Director of Public Works, *City of Seal Beach*
211 Eighth Street, Seal Beach, CA 90740
Phone: (562) 431-2527
smyrter@sealbeachca.gov

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

Gregory Newmark, *Meyers Nave*
707 Wilshire Blvd., 24th Floor, Los Angeles, CA 90017

Phone: (213) 626-2906
gnewmark@meyersnave.com

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

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

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

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

Leon Page, County Counsel, *333 W. Santa Ana Blvd.*
, Santa Ana, CA 92702
Phone: (714) 834-3303
leon.page@coco.ocgov.com

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

Eric Parra, Interim City Manager, *City of Huntington Beach*
Claimant Contact
2000 Main St, Huntington Beach, CA 92648
Phone: (714) 536-5202
eparra@surfcity-hb.org

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

Jai Prasad, *County of San Bernardino*
Office of Auditor-Controller, 222 West Hospitality Lane, 4th Floor, San Bernardino, CA 92415-0018
Phone: (909) 386-8854
jai.prasad@sbcountyatc.gov

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@sdcountry.ca.gov

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

David Rice, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 341-5161
david.rice@waterboards.ca.gov

Elsa Robinson, *City of Placentia*
401 East Chapman Avenue, Placentia, CA 92870
Phone: (714) 993-8148
erobinson@placentia.org

Debra Rose, City Manager, *City of Lake Forest*
Claimant Contact
100 Civic Center Drive, Lake Forest, CA 92630
Phone: (949) 461-3400
drose@lakeforestca.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

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

Michaela Schunk, Legislative Coordinator, *California State Association of Counties (CSAC)*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
mschunk@counties.org

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

Raja Sethuraman, Director of Public Works, *City of Costa Mesa*
Department of Public Works, 77 Fair Drive, Costa Mesa, CA 92628
Phone: (714) 754-5343
raja.sethuraman@costamesaca.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

Carla Shelton, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562
carla.shelton@csm.ca.gov

Wayne Shimabukuro, *County of San Bernardino*

Auditor/Controller-Recorder-Treasurer-Tax Collector, 222 West Hospitality Lane, 4th Floor, San Bernardino, CA 92415-0018

Phone: (909) 386-8850
wayne.shimabukuro@atc.sbcounty.gov

Jennifer Shook, *County of Orange - OC Public Works Department*

OC Watersheds Program - Stormwater External, 2301 N. Glassell Street, Orange, CA 92865

Phone: (714) 955-0671
jennifer.shook@ocpw.ocgov.com

Natalie Sidarous, *Chief, State Controller's Office*

Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: 916-445-8717
NSidarous@sco.ca.gov

Mike Smith, *Water Quality Manager, City of Cypress*

5275 Orange Avenue, Cypress, CA 90630

Phone: (714) 229-6752
waterquality@cypressca.org

Ryan Smith, *Director of Finance, City of Fountain Valley*

10200 Slater Avenue, Fountain Valley, CA 92708

Phone: (714) 593-4501
Ryan.Smith@fountainvalley.org

Cristina Talley, *City Attorney, City of Anaheim*

200 S. Anaheim Boulevard #356, Anaheim, CA 92805

Phone: (714) 765-5169
CTalley@anaheim.net

Jolene Tollenaar, *MGT Consulting Group*

2251 Harvard Street, Suite 134, Sacramento, CA 95815

Phone: (916) 243-8913
jolenetollenaar@gmail.com

James Treadaway, *Director of Public Works, County of Orange*

300 North Flower Street, Santa Ana, CA 92703

Phone: (714) 667-9700
James.Treadaway@ocpw.ocgov.com

Brian Uhler, *Principal Fiscal & Policy Analyst, Legislative Analyst's Office*

925 L Street, Suite 1000, Sacramento, CA 95814

Phone: (916) 319-8328
Brian.Uhler@LAO.CA.GOV

Travis Van Ligten, *Associate, Rutan & Tucker, LLP*

611 Anton Blvd, Suite 1400, Costa Mesa, CA 92626

Phone: (714) 641-5100
tvanligten@rutan.com

Emel Wadhvani, *Senior Staff Counsel, State Water Resources Control Board*

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

Phone: (916) 322-3622
emel.wadhvani@waterboards.ca.gov

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

David Webb, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3328
dwebb@newportbeachca.gov

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

Tom Wheeler, Director of Public Works, *City of Lake Forest*
100 Civic Center Drive, Lake Forest, CA 92630
Phone: (949) 461-3480
twheeler@lakeforestca.gov

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

Colleen Winchester, Senior Deputy City Attorney, *City of San Jose*
200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1987
Colleen.Winchester@sanjoseca.gov

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

Jacqueline Wong-Hernandez, Deputy Executive Director for Legislative Affairs, *California State Association of Counties (CSAC)*
1100 K Street, Sacramento, CA 95814
Phone: (916) 650-8104
jwong-hernandez@counties.org

Julia Woo, Deputy County Counsel, *County of Orange*
333 West Santa Ana Blvd, Suite 407, Santa Ana, CA 92701
Phone: (714) 834-6046
julia.woo@coco.ocgov.com

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

Juan Zavala, Principal Engineer, *City of Fullerton*

Public Works, 303 West Commonwealth Avenue, Fullerton, CA 92832

Phone: (714) 738-6845

Juan.Zavala@cityoffullerton.com

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