

BEFORE THE  
COMMISSION ON STATE MANDATES  
STATE OF CALIFORNIA

<p><b>IN RE PARAMETERS AND GUIDELINES</b></p> <p>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</p> <p>Period of reimbursement from June 1, 2009, through December 31, 2017</p>	<p>Case No.: 09-TC-03</p> <p><i>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</i></p> <p>DECISION PURSUANT TO GOVERNMENT CODE SECTION 17500 ET SEQ.; CALIFORNIA CODE OF REGULATIONS, TITLE 2, DIVISION 2, CHAPTER 2.5, ARTICLE 7.</p> <p><i>(Adopted September 22, 2023)</i></p> <p><i>(Served September 28, 2023)</i></p>
---	---

**PARAMETERS AND GUIDELINES**

The Commission on State Mandates adopted the attached Decision and Parameters and Guidelines on September 22, 2023.



\_\_\_\_\_  
Heather Halsey, Executive Director

BEFORE THE  
COMMISSION ON STATE MANDATES  
STATE OF CALIFORNIA

<p><b>IN RE PARAMETERS AND GUIDELINES</b></p> <p><i>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</i></p> <p>Period of reimbursement from June 1, 2009, through December 31, 2017</p>	<p>Case No.: 09-TC-03</p> <p><i>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</i></p> <p>DECISION PURSUANT TO GOVERNMENT CODE SECTION 17500 ET SEQ.; CALIFORNIA CODE OF REGULATIONS, TITLE 2, DIVISION 2, CHAPTER 2.5, ARTICLE 7.</p> <p><i>(Adopted September 22, 2023)</i></p> <p><i>(Served September 28, 2023)</i></p>
--	---

**DECISION**

The Commission on State Mandates (Commission) heard and decided the Decision and Parameters and Guidelines during a regularly scheduled hearing on September 22, 2023. David Burhenn appeared for the claimants. Donna Ferebee appeared for the Department of Finance.

The law applicable to the Commission’s determination of a reimbursable state-mandated program is article XIII B, section 6 of the California Constitution, Government Code sections 17500 et seq., and related case law.

The Commission adopted the Decision and Parameters and Guidelines by a vote of 5-0, as follows:

<b>Member</b>	<b>Vote</b>
Lee Adams, County Supervisor	Yes
Regina Evans, Representative of the State Controller, Vice Chairperson	Absent
Jennifer Holman, Representative of the Director of the Office of Planning and Research	Yes
Gayle Miller, Representative of the Director of the Department of Finance, Chairperson	Yes
Renee Nash, School District Board Member	Absent
Sarah Olsen, Public Member	Yes

Member	Vote
Spencer Walker, Representative of the State Treasurer	Yes

## I. Summary of the Mandate

These Parameters and Guidelines address state-mandated activities arising from NPDES Order No. R8-2009-0030, adopted by the Santa Ana Regional Water Quality Control Board on May 22, 2009.

On March 24, 2023, the Commission on State Mandates (Commission) adopted its Decision finding that the test claim permit imposes a reimbursable state-mandated program upon local agencies within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514 from June 1, 2009, through December 31, 2017 only. The Commission partially approved this test claim for the following reimbursable activities only:

- 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, whichever is later. (Order No. R8-2009-0030, Section XVIII.B.8.)
- 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. (Order No. R8-2009-0030, Section XVIII.B.9.)
- Public education program:
  - 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.)
  - 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.)
  - 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.)

- 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.)

Reimbursement for these activities is denied beginning January 1, 2018, because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d) and, thus, there are no costs mandated by the state.

In addition, reimbursement for these mandated activities 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.

All other sections, activities, and costs pled in the Test Claim were denied.<sup>1</sup>

## **II. Procedural History**

On March 24, 2023, the Commission adopted the Test Claim Decision.<sup>2</sup> On March 24, 2023, the Commission issued the Draft Expedited Parameters and Guidelines.<sup>3</sup> On April 14, 2023, the claimants filed comments on the Draft Expedited Parameters and Guidelines requesting changes to Sections IV. and VII.<sup>4</sup> Commission staff issued the Draft Proposed Decision and Parameters and Guidelines on May 18, 2023.<sup>5</sup> No comments were filed on the Draft Proposed Decision and Parameters and Guidelines.

## **III. Party Positions**

### **A. Claimants' Position**

The claimants filed comments on the Draft Expedited Parameters and Guidelines, requesting that the boilerplate language in Section IV. of the Parameters and Guidelines, which require that actual costs claimed be supported by contemporaneous source documents, be amended to specifically reference accounting records and emails

---

<sup>1</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, pages 246-247.

<sup>2</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023.

<sup>3</sup> Exhibit B, Draft Expedited Parameters and Guidelines, issued March 24, 2023.

<sup>4</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023.

<sup>5</sup> Exhibit D, Draft Proposed Decision and Parameters and Guidelines, issued May 18, 2023.

as additional examples of "source documents" that can be used to support the existence of an "actual cost."<sup>6</sup>

The claimants also request that the share of cost funds received by the County as the principal permittee from the city permittees under their cost sharing agreement not be identified as offsetting revenues, and that the County should be able to claim all costs jointly funded by all permittees, proposing the following additional language to Section VII. Offsetting Revenues and Reimbursements:

However, with respect to reimbursement claims filed by the County of Orange, any portions thereof reflecting funds received from the County's co-permittees under the Test Claim Permit, pursuant to cost-share arrangements in their stormwater program Implementation Agreement, shall not be deemed offsetting revenues or reimbursements. The County of Orange, on behalf of itself and the other claimants (e.g., Test Claim Permit co-permittees) may claim costs jointly funded by the County and the other claimants through their Implementation Agreement. In such a case, any funds received by the County of Orange on behalf of any other claimant should be paid or credited to the other claimant.<sup>7</sup>

No other comments were received.

#### **IV. Discussion**

The Parameters and Guidelines contain the following information:

##### **A. Eligible Claimants (Section II. of the Parameters and Guidelines)**

The following permittees are required to comply with Order No. R8-2009-0030 and are eligible to claim reimbursement, provided they are subject to the taxing restrictions of articles XIII A and XIII C of the California Constitution, and the spending limits of article XIII B of the California Constitution, and incur increased costs as a result of this mandate that are paid from their local proceeds of taxes:

The County of Orange, Orange County Flood Control District (OCFCD) and the incorporated cities of Anaheim, Brea, 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.<sup>8</sup>

---

<sup>6</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, pages 1-2.

<sup>7</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, page 2.

<sup>8</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, page 3.

## **B. Period of Reimbursement (Section III. of the Parameters and Guidelines)**

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The claimant filed the test claim on June 30, 2010, establishing eligibility for reimbursement for the 2008-2009 fiscal year. However, the test claim permit has a later effective date and therefore the period of reimbursement for this program begins on the permit's effective date, June 1, 2009. Beginning January 1, 2018, there are no costs mandated by the state because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d). Therefore, costs incurred are reimbursable from June 1, 2009, through December 31, 2017.

## **C. Reimbursable Activities (Section IV. of the Parameters and Guidelines)**

The Commission partially approved the Test Claim, authorizing reimbursement for the following mandated activities from June 1, 2009 through December 31, 2017:

- 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, whichever is later. (Order No. R8-2009-0030, Section XVIII.B.8.)
- 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. (Order No. R8-2009-0030, Section XVIII.B.9.)
- Public education program:
  - 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.)
  - 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.)
  - 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.)

- 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.)

These activities are identified in the Parameters and Guidelines.

The claimants also request that the boilerplate language in Section IV. of the Parameters and Guidelines, which require that actual costs claimed be supported by contemporaneous source documents, be amended to specifically reference accounting records and emails as additional examples of "source documents" that can be used to support the existence of an "actual cost," as follows (proposed changes in ~~strikeout~~ and underline):

To be eligible for mandated cost reimbursement for any fiscal year, only actual costs may be claimed. Actual costs are those costs actually incurred to implement the mandated activities. Actual costs must be traceable and supported by source documents that show the validity of such costs, when they were incurred, and their relationship to the reimbursable activities. A source document is a document created at or near the same time the actual cost was incurred for the event, or activity in question, including electronic records (such as emails or accounting records). Source documents may include, but are not limited to, employee time records or time logs, sign-in sheets, invoices, ~~and~~ receipts, accounting records generated in a claimants' normal course of business (including, but not limited to, general ledger details) and/or emails evidencing work being performed or completed, among other potential records.

Evidence corroborating the source documents may include, but is not limited to, worksheets, cost allocation reports (system generated), purchase orders, contracts, agendas, training packets, and declarations. Declarations must include a certification or declaration stating, "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct," and must further comply with the requirements of Code of Civil Procedure section 2015.5. Evidence corroborating the source documents may include data relevant to the reimbursable activities otherwise in compliance with local, state, and federal government requirements. However, corroborating documents cannot be substituted for source documents.<sup>9</sup>

---

<sup>9</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, pages 1-2.

The boilerplate language was developed in 2003 with the Controller's Office and interested parties and persons, after the Bureau of State Audits recommended and the Legislature enacted Statutes 2002, chapter 1167 (AB 2781) to direct the Commission to amend the parameters and guidelines in the *School Bus Safety II* program to detail the documentation necessary to support reimbursement claims. The boilerplate language has generally remained the same since 2003.<sup>10</sup>

The Commission denies the claimants' request. The *non-exclusive* list of possible documents identified in the boilerplate language are examples of the types of documents considered source documents and those considered corroborating evidence that might be maintained by a claimant. Therefore, additional examples are not necessary. Moreover, the documentation maintained to support a reimbursement claim will vary depending on the program, the mandated activities, and the claimant. The documentation is subject to the Controller's review and audit to determine whether the documentation supports the actual costs claimed. Accordingly, the request is denied.

**D. Claim Preparation and Submission (Section V. of the Parameters and Guidelines)**

Section V. of the Parameters and Guidelines (Claim Preparation and Submission) identifies the direct costs that are eligible for reimbursement.

**E. Offsetting Revenues and Reimbursements (Section VII. of the Parameters and Guidelines)**

Section VII. of the Parameters and Guidelines governs offsetting revenues (i.e., funds that are not a claimant's proceeds of taxes), which are required to be identified and deducted from the costs claimed.

In the Test Claim Decision, the Commission determined that the County of Orange is the principal permittee under the test claim permit, and to the extent the County receives funds from other sources, including from fees, grant funding, and from the other copermittes under a cost-sharing agreement, those funds are *not* the County's proceeds of taxes.

The County of Orange, in a declaration signed by the Chief of the Orange County Stormwater Program, further states that "in addition to its General Fund, [the County] had sources other than County funding, including landfill gate fees and special district funding, for certain Permit obligations. To the extent such fees were employed and/or such funds were

---

<sup>10</sup> See also, *Clovis Unified School Dist. v. John Chiang as State Controller* (2010) 188 Cal.App.4th 794, 802-807 where the Controller revised its claiming instructions in 2003 to include the boilerplate language requiring contemporaneous source documents on older state-mandated programs for fiscal years when the parameters and guidelines did not yet contain the requirement. The court found that since the parameters and guidelines did not contain the requirement for the earlier fiscal years in question, the requirement in the claiming instructions constituted an invalid, underground regulation.



appropriated for such obligations, they would not be available for other County obligations.” [Citation omitted.] In a second declaration filed by Orange County with the Test Claim, it is declared that the County was designated the principal permittee and the County and the City permittees have a cost-sharing agreement for compliance with the test claim permit. [Citation omitted.] To the extent the County receives funds from other sources, including from fees, grant funding, and from the other copermittees under an agreement, those funds are *not* the County’s proceeds of taxes. These funds received by the County are not taxes levied by or for the County, and are not counted against the County’s appropriations limit.<sup>11</sup>

The Commission also recognized that “the claimants have a number of different revenue streams with which to fund stormwater pollution control activities, and the record indicates a mix of different revenues being applied throughout the County to pay for the activities required by the prior permit and the test claim permit.”<sup>12</sup> The record also showed that the claimants’ reliance on General Fund revenues decreased after the test claim permit was adopted.<sup>13</sup>

Thus, the Commission concluded that “reimbursement for these mandated activities 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.”<sup>14</sup>

---

<sup>11</sup> Exhibit A, Test Claim Decision, issued March 24, 2023, pages 197-198, citing to California Constitution, article XIII B, section 8; *Bell Community Redevelopment Agency v. Woosley* (1985) 169 Cal.App.3d 24, 32. See also, *County of Fresno v. State of California* (1991) 53 Cal.3d 482, 487 (“read in its textual and historical context section 6 of article XIII B requires subvention only when the costs in question can be recovered *solely from tax revenues.*”); *Department of Finance v. Commission on State Mandates* (2016) 1 Cal.5th 749, 763 (articles XIII A and XIII B work “in tandem,” for the purpose of precluding “the state from shifting financial responsibility for carrying out governmental functions to local agencies, which are ‘ill equipped’ to assume increased financial responsibilities *because of the taxing and spending limitations that articles XIII A and XIII B impose.*”); and *County of Sonoma v. Commission on State Mandates* (2000) 84 Cal.App.4th 1264, 1283; *County of Los Angeles v. Commission on State Mandates* (2003) 110 Cal.App.4th 1176, 1185 (reimbursement under article XIII B, section 6 is only required when a mandated new program or higher level of service forces local government to incur “*increased actual expenditures of limited tax proceeds that are counted against the local government’s spending limit.*”).

<sup>12</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, page 198.

<sup>13</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, page 202.

<sup>14</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, page 247.

This language was included in Section VII. of the Draft Expedited Parameters and Guidelines.<sup>15</sup> The claimants now request the following additional language (in underline) be added to Section VII.:

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. However, with respect to reimbursement claims filed by the County of Orange, any portions thereof reflecting funds received from the County's co-permittees under the Test Claim Permit, pursuant to cost-share arrangements in their stormwater program Implementation Agreement, shall not be deemed offsetting revenues or reimbursements. The County of Orange, on behalf of itself and the other claimants (e.g., Test Claim Permit co-permittees) may claim costs jointly funded by the County and the other claimants through their Implementation Agreement. In such a case, any funds received by the County of Orange on behalf of any other claimant should be paid or credited to the other claimant.<sup>16</sup>

The claimants explain that the County, as the principal permittee,

. . . is charged with responsibility for overall program management, including the submission of unified reports, plans and programs required by the permit. Permit, Section I.A. The County coordinates permit activities, including implementation of areawide activities such as public education, and pollution prevention. Permit, Section I.B. The co-permittees participate on a Management Committee, but the County is charged with taking the lead in initiating and developing areawide programs and activities required by the Permit. Permit, Section II.B.1.<sup>17</sup>

The claimants also state that their request

. . . is simply to reflect the County's role as Principal Permittee and the funding mechanism for shared costs set forth in the Implementation Agreement. For those activities for which the County has taken the lead,

---

<sup>15</sup> Exhibit B, Draft Expedited Parameters and Guidelines, issued March 24, 2023, page 11.

<sup>16</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, page 2.

<sup>17</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, page 3.

the County, rather than the other claimants, is the party that has the source documents required to support the claim. With this modification, the County, having collected and used funds from the other claimants for the development and implementation of these activities, could then file a claim on behalf of itself and the other claimants for those costs and then reimburse or credit the other claimants their respective share of the reimbursement.<sup>18</sup>

The Commission denies the claimants' request. First, the proposed language in the first sentence ("with respect to reimbursement claims filed by the County of Orange, any portions thereof reflecting funds received from the County's co-permittees under the Test Claim Permit, pursuant to cost-share arrangements in their stormwater program Implementation Agreement, shall not be deemed offsetting revenues or reimbursements"), conflicts with the Commission's Test Claim Decision. As stated above, the Commission found that funds received by the County "from the other copermitees under an agreement . . . are *not* the County's proceeds of taxes" and cannot be claimed by the County.<sup>19</sup> Commission decisions on test claims, including the Decision issued in this case, are binding, unless set aside by the courts.<sup>20</sup>

In addition, the claimants' proposed second sentence ("The County of Orange, on behalf of itself and the other claimants (e.g., Test Claim Permit co-permittees) may claim costs jointly funded by the County and the other claimants through their Implementation Agreement. In such a case, any funds received by the County of Orange on behalf of any other claimant should be paid or credited to the other claimant"), conflicts with the mandates process in the Government Code. Except for schools, direct service districts, or special districts whose costs may not reach the minimum \$1,000, the Government Code requires each eligible claimant to file its own reimbursement claim and does not allow one local agency to file a combined claim for the costs incurred by other eligible local agencies. Government Code 17564 states the following:

(a) No claim shall be made pursuant to Sections 17551, 17561, or 17573, nor shall any payment be made on claims submitted pursuant to Sections 17551 or 17561, or pursuant to a legislative determination under Section 17573, unless these claims exceed one thousand dollars (\$1,000). *However, a county superintendent of schools or county may submit a combined claim on behalf of school districts, direct service districts, or special districts within their county if the combined claim exceeds one thousand dollars (\$1,000) even if the individual school district's, direct*

---

<sup>18</sup> Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, filed April 14, 2023, page 3.

<sup>19</sup> Exhibit A, Test Claim Decision, adopted March 24, 2023, pages 197-198.

<sup>20</sup> Government Code section 17559; *California School Boards Assoc. v. State of California* (2009) 171 Cal.App.4th 1183, 1200-1201.

*service district's, or special district's claims do not each exceed one thousand dollars (\$1,000).* The county superintendent of schools or the county shall determine if the submission of the combined claim is economically feasible and shall be responsible for disbursing the funds to each school, direct service, or special district. *These combined claims may be filed only when the county superintendent of schools or the county is the fiscal agent for the districts.* All subsequent claims based upon the same mandate shall only be filed in the combined form unless a school district, direct service district, or special district provides to the county superintendent of schools or county and to the Controller, at least 180 days prior to the deadline for filing the claim, a written notice of its intent to file a separate claim.

(b) Claims for direct and indirect costs filed pursuant to Section 17561 shall be filed in the manner prescribed in the parameters and guidelines or reasonable reimbursement methodology and claiming instructions. (Emphasis added.)

Additionally, Government Code section 17561(d)(1)(A) then states that “When claiming instructions are issued by the Controller pursuant to Section 17558 for each mandate determined pursuant to Section 17551 or 17573 that requires state reimbursement, *each* local agency or school district to which the mandate is applicable shall submit claims for initial fiscal year costs to the Controller within 120 days of the issuance date for the claiming instructions.” (Emphasis added.) Government Code section 17560(a) provides that “*A local agency or school district* may, by February 15 following the fiscal year in which costs are incurred, file an annual reimbursement claim that details the costs actually incurred for that fiscal year.” (Emphasis added.) Thus, each agency is required to submit their own claim for their initial and annual costs.

In addition, Section V. of the Parameters and Guidelines clarifies that contracted services provided to comply with the state-mandated duties are direct costs that are eligible for reimbursement by the local agency claimant incurring those costs as follows:

Report the name of the contractor and services performed to implement the reimbursable activities. If the contractor bills for time and materials, report the number of hours spent on the activities and all costs charged. If the contract is a fixed price, report the services that were performed during the period covered by the reimbursement claim. If the contract services are also used for purposes other than the reimbursable activities, only the pro-rata portion of the services used to implement the reimbursable activities can be claimed. Submit contract consultant and attorney invoices with the claim and a description of the contract scope of services.

Thus, any share of costs paid by an eligible city to the principal permittee under the permittees’ implementation agreement to comply with the state-mandated activities may be claimed by the city pursuant to Government Code section 17561(d)(1)(A) and Section V. of the Parameters and Guidelines. The city is required to identify and deduct from its claim any portion of those funds that are not the city’s proceeds of taxes.

Likewise, the County is authorized to claim only for its own costs incurred to comply with the mandated activities, may not claim the cities' costs, and must identify and deduct as offsetting revenues any funds received for its own state-mandated expenses that are *not* the County's proceeds of taxes. This language has been added to Section VII. for clarification.

#### **F. The Remaining Sections of the Parameters and Guidelines**

The remaining sections of the Parameters and Guidelines contain standard boilerplate language.

#### **V. Conclusion**

Based on the foregoing, the Commission hereby adopts the Proposed Decision and Parameters and Guidelines.

### **PARAMETERS AND GUIDELINES<sup>21</sup>**

*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

Period of reimbursement from June 1, 2009, through December 31, 2017

---

#### **I. SUMMARY OF THE MANDATE**

These Parameters and Guidelines address state-mandated activities arising from NPDES Order No. R8-2009-0030, adopted by the Santa Ana Regional Water Quality Control Board on May 22, 2009.

On March 24, 2023, the Commission on State Mandates (Commission) adopted its Decision finding that the test claim permit imposes a reimbursable state-mandated program upon local agencies within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514 from June 1, 2009, through December 31, 2017 only. The Commission partially approved this test claim for the following reimbursable activities only:

- Submit a proposed Cooperative Watershed Program that will fulfill applicable requirements of the selenium TMDL implementation plan within 24 months of

---

<sup>21</sup> Please note that the Decision and Parameters and Guidelines is a single document and must be read as a whole. It is not intended to be separated and should be posted in its entirety.

adoption of the test claim permit, or one month after approval of the Regional Board selenium TMDLs by OAL, whichever is later. (Section XVIII.B.8.)<sup>22</sup>

- 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. (Section XVIII.B.9.)<sup>23</sup>
- Public education program:
  - 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. (Section XIII.1.)<sup>24</sup>
  - 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. (Section XIII.4.)<sup>25</sup>
  - 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. (Section XIII.7.)<sup>26</sup>

---

<sup>22</sup> Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 343 [Order No. R8-2009-0030, Section XVIII.B.8].

<sup>23</sup> Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 343 [Order No. R8-2009-0030, Section XVIII.B.9].

<sup>24</sup> Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 332 [Order No. R8-2009-0030, Section XIII.1].

<sup>25</sup> Exhibit A, Joint Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 332 [Order No. R8-2009-0030, Section XIII.4].

<sup>26</sup> Exhibit A, Joint Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 333 [Order No. R8-2009-0030, Section XIII.7].

- 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. (Section XI.4.)<sup>27</sup>

Reimbursement for these activities is denied beginning January 1, 2018, because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d) and, thus, there are no costs mandated by the state.

In addition, reimbursement for these mandated activities 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.

All other sections, activities, and costs pled in the Test Claim were denied.

## **II. ELIGIBLE CLAIMANTS**

The following permittees are required to comply with Order No. R8-2009-0030 and are eligible to claim reimbursement, provided they are subject to the taxing restrictions of articles XIII A and XIII C of the California Constitution, and the spending limits of article XIII B of the California Constitution, and incur increased costs as a result of this mandate that are paid from their local proceeds of taxes:

The County of Orange, Orange County Flood Control District (OCFCD) and the incorporated cities of Anaheim, Brea, 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.<sup>28</sup>

## **III. PERIOD OF REIMBURSEMENT**

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The claimant filed the test claim on June 30, 2010, establishing eligibility for reimbursement for the 2008-2009 fiscal year. However, the test claim permit has a later effective date and therefore the period of reimbursement for this program begins on the permit's effective date, June 1, 2009. Beginning January 1, 2018, there are no costs mandated by the state because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d). Therefore, costs incurred are reimbursable from June 1, 2009, through December 31, 2017.

---

<sup>27</sup> Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, pages 316-317 [Order No. R8-2009-0030, Section XI.4].

<sup>28</sup> Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, page 273 [Order No. R8-2009-0030, Finding B].

Reimbursement for state-mandated costs may be claimed as follows:

1. Actual costs for one fiscal year shall be included in each claim.
2. Pursuant to Government Code section 17561(d)(1)(A), all claims for reimbursement of initial fiscal year costs shall be submitted to the State Controller (Controller) within 120 days of the issuance date for the claiming instructions.
3. Pursuant to Government Code section 17560(a), a local agency may, by February 15 following the fiscal year in which costs were incurred, file an annual reimbursement claim that details the costs actually incurred for that fiscal year.
4. If revised claiming instructions are issued by the Controller pursuant to Government Code section 17558(c), between November 15 and February 15, a local agency filing an annual reimbursement claim shall have 120 days following the issuance date of the revised claiming instructions to file a claim. (Gov. Code §17560(b).)
5. If the total costs for a given fiscal year do not exceed \$1,000, no reimbursement shall be allowed except as otherwise allowed by Government Code section 17564(a).
6. There shall be no reimbursement for any period in which the Legislature has suspended the operation of a mandate pursuant to state law.

#### **IV. REIMBURSABLE ACTIVITIES**

To be eligible for mandated cost reimbursement for any fiscal year, only actual costs may be claimed. Actual costs are those costs actually incurred to implement the mandated activities. Actual costs must be traceable and supported by source documents that show the validity of such costs, when they were incurred, and their relationship to the reimbursable activities. A source document is a document created at or near the same time the actual cost was incurred for the event, or activity in question. Source documents may include, but are not limited to, employee time records or time logs, sign-in sheets, invoices, and receipts.

Evidence corroborating the source documents may include, but is not limited to, worksheets, cost allocation reports (system generated), purchase orders, contracts, agendas, training packets, and declarations. Declarations must include a certification or declaration stating, "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct," and must further comply with the requirements of Code of Civil Procedure section 2015.5. Evidence corroborating the source documents may include data relevant to the reimbursable activities otherwise in compliance with local, state, and federal government requirements. However, corroborating documents cannot be substituted for source documents.

The claimant is only allowed to claim and be reimbursed for increased costs for reimbursable activities identified below. Increased cost is limited to the cost of an activity that the claimant is required to incur as a result of the mandate.



For each eligible claimant that incurs increased costs, the following activities are reimbursable:

- 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, 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 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.)
- 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. 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.)

## **V. CLAIM PREPARATION AND SUBMISSION**

Each of the following cost elements must be identified for each reimbursable activity identified in Section IV., Reimbursable Activities, of this document. Each claimed reimbursable cost must be supported by source documentation as described in Section IV. Additionally, each reimbursement claim must be filed in a timely manner.

## A. Direct Cost Reporting

Direct costs are those costs incurred specifically for the reimbursable activities. The following direct costs are eligible for reimbursement.

### 1. Salaries and Benefits

Report each employee implementing the reimbursable activities by name, job classification, and productive hourly rate (total wages and related benefits divided by productive hours). Describe the specific reimbursable activities performed and the hours devoted to each reimbursable activity performed.

### 2. Materials and Supplies

Report the cost of materials and supplies that have been consumed or expended for the purpose of the reimbursable activities. Purchases shall be claimed at the actual price after deducting discounts, rebates, and allowances received by the claimant. Supplies that are withdrawn from inventory shall be charged on an appropriate and recognized method of costing, consistently applied.

### 3. Contracted Services

Report the name of the contractor and services performed to implement the reimbursable activities. If the contractor bills for time and materials, report the number of hours spent on the activities and all costs charged. If the contract is a fixed price, report the services that were performed during the period covered by the reimbursement claim. If the contract services are also used for purposes other than the reimbursable activities, only the pro-rata portion of the services used to implement the reimbursable activities can be claimed. Submit contract consultant and attorney invoices with the claim and a description of the contract scope of services.

### 4. Fixed Assets

Report the purchase price paid for fixed assets (including computers) necessary to implement the reimbursable activities. The purchase price includes taxes, delivery costs, and installation costs. If the fixed asset is also used for purposes other than the reimbursable activities, only the pro-rata portion of the purchase price used to implement the reimbursable activities can be claimed.

## B. Indirect Cost Rates

Indirect costs are costs that are incurred for a common or joint purpose, benefiting more than one program, and are not directly assignable to a particular department or program without efforts disproportionate to the result achieved. Indirect costs may include both: (1) overhead costs of the unit performing the mandate; and (2) the costs of the central government services distributed to the other departments based on a systematic and rational basis through a cost allocation plan.

Compensation for indirect costs is eligible for reimbursement in accordance with the Office of Management and Budget Circular 2 CFR, Chapter I and Chapter II, Part 200 et al.

Claimants have the option of using 10 percent of direct labor, excluding fringe benefits, or preparing an Indirect Cost Rate Proposal (ICRP) if the indirect cost rate claimed exceeds 10 percent.

If the claimant chooses to prepare an ICRP, both the direct costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) and the indirect costs shall exclude capital expenditures and unallowable costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.). However, unallowable costs must be included in the direct costs if they represent activities to which indirect costs are properly allocable.

The distribution base may be: (1) total direct costs (excluding capital expenditures and other distorting items, such as pass-through funds, major subcontracts, etc.); (2) direct salaries and wages; or (3) another base which results in an equitable distribution.

In calculating an ICRP, the claimant shall have the choice of one of the following methodologies:

1. The allocation of allowable indirect costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) shall be accomplished by: (1) classifying a department's total costs for the base period as either direct or indirect; and (2) dividing the total allowable indirect costs (net of applicable credits) by an equitable distribution base. The result of this process is an indirect cost rate which is used to distribute indirect costs to mandates. The rate should be expressed as a percentage that the total amount of allowable indirect costs bears to the base selected; or
2. The allocation of allowable indirect costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) shall be accomplished by: (1) separating a department into groups, such as divisions or sections, and then classifying the division's or section's total costs for the base period as either direct or indirect; and (2) dividing the total allowable indirect costs (net of applicable credits) by an equitable distribution base. The result of this process is an indirect cost rate that is used to distribute indirect costs to mandates. The rate should be expressed as a percentage which the total amount of allowable indirect costs bears to the base selected.

## **VI. RECORD RETENTION**

Pursuant to Government Code section 17558.5(a), a reimbursement claim for actual costs filed pursuant to this chapter<sup>29</sup> is subject to the initiation of an audit by the Controller no later than three years after the date that the actual reimbursement claim is filed or last amended, whichever is later. However, if no funds are appropriated or no payment is made to a claimant for the program for the fiscal year for which the claim is filed, the time for the Controller to initiate an audit shall commence to run from the date of initial payment of the claim. In any case, an audit shall be completed not later than

---

<sup>29</sup> This refers to title 2, division 4, part 7, chapter 4 of the Government Code.

two years after the date that the audit is commenced. All documents used to support the reimbursable activities, as described in Section IV., must be retained during the period subject to audit. If an audit has been initiated by the Controller during the period subject to audit, the retention period is extended until the ultimate resolution of any audit findings.

## **VII. OFFSETTING REVENUES AND REIMBURSEMENTS**

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.

## **VIII. STATE CONTROLLER'S CLAIMING INSTRUCTIONS**

Pursuant to Government Code section 17558(b), the Controller shall issue claiming instructions for each mandate that requires state reimbursement not later than 90 days after receiving the adopted parameters and guidelines from the Commission, to assist local governments in claiming costs to be reimbursed. The claiming instructions shall be derived from these parameters and guidelines and the decisions on the test claim and parameters and guidelines adopted by the Commission.

Pursuant to Government Code section 17561(d)(1), issuance of the claiming instructions shall constitute a notice of the right of the eligible claimants to file reimbursement claims, based upon parameters and guidelines adopted by the Commission.

## **IX. REMEDIES BEFORE THE COMMISSION**

Upon request of an eligible claimant, the Commission shall review the claiming instructions issued by the Controller or any other authorized state agency for reimbursement of mandated costs pursuant to Government Code section 17571. If the Commission determines that the claiming instructions do not conform to the parameters and guidelines, the Commission shall direct the Controller to modify the claiming instructions and the Controller shall modify the claiming instructions to conform to the parameters and guidelines as directed by the Commission.

In addition, requests may be made to amend parameters and guidelines pursuant to Government Code section 17557(d), and California Code of Regulations, title 2, section 1183.17.

## **X. LEGAL AND FACTUAL BASIS FOR THE PARAMETERS AND GUIDELINES**

The decisions adopted for the test claim and parameters and guidelines are legally binding on all parties and interested parties and provide the legal and factual basis for the parameters and guidelines. The support for the legal and factual findings is found in the administrative record. The administrative record is on file with the Commission.

## 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 September 28, 2023, I served the:

- **Current Mailing List dated September 27, 2023**
- **Decision and Parameters and Guidelines adopted September 22, 2023**

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

County of Orange, Orange County Flood Control District; and the Cities of  
Anaheim, Brea, Buena Park, Costa Mesa, Cypress, Fountain Valley, Fullerton,  
Huntington Beach, Irvine, Lake Forest, Newport Beach, Placentia, Seal Beach,  
and Villa Park, Claimants

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 September 28, 2023 at Sacramento, California.



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

# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 9/27/23

**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

**Rebecca Andrews**, Partner, *Best Best & Krieger, LLP*  
655 West Broadway, 15th Floor, San Diego, CA 92101  
Phone: (619) 525-1300  
Rebecca.Andrews@bbklaw.com

**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@bbklaw.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

**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

**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

**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  
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

**Kris Cook, Assistant Program Budget Manager, *Department of Finance***  
915 L Street, 10th Floor, Sacramento, CA 95814



Phone: (916) 445-3274  
Kris.Cook@dof.ca.gov

**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

**Brian Cote**, Senior Government Finance & Administration Analyst, *California State Association of Counties (CSAC)*  
1100 K Street, Suite 101, Sacramento, CA 95814  
Phone: (916) 650-8184  
bcote@counties.org

**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

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

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

**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@biasec.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

**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**, Acting 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

**Steven Hauerwaas**, *City of Fountain Valley*  
10200 Siater Avenue, Fountain Valley, CA 92708-4736  
Phone: (714) 593-4441  
steve.hauerwaas@fountainvalley.org

**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, 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

**Rob Houston**, City Manager, *City of Fountain Valley*

**Claimant Contact**

10200 Slater Avenue, Fountain Valley, CA 92708

Phone: (714) 593-4410

rob.houston@fountainvalley.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

**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

**Shally Lin**, Director of Finance - Interim, *City of Fountain Valley*  
10200 Slater Avenue, Fountain Valley, CA 92708  
Phone: (714) 593-4418  
Shally.Lin@fountainvalley.org

**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

**Jane McPherson**, Financial Services Director, *City of Oceanside*  
300 North Coast Highway, Oceanside, CA 92054  
Phone: (760) 435-3055  
JmcPherson@oceansideca.org

**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@bbklaw.com

**Lourdes Morales**, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*  
925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8320  
Lourdes.Morales@LAO.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

**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: (510) 808-2000

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

**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

**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@sdcounty.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

**Cindy Sconce**, *Director, MGT*  
Performance Solutions Group, 3600 American River Drive, Suite 150, Sacramento, CA 95864  
Phone: (916) 276-8807  
csconce@mgtconsulting.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@esm.ca.gov

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

**Michelle Skaggs Lawrence**, City Manager, *City of Oceanside*  
300 North Coast Highway, Oceanside, CA 92054  
Phone: (760) 435-3055  
citymanager@oceansideca.org

**Mike Smith**, Water Quality Manager, *City of Cypress*  
5275 Orange Avenue, Cypress, CA 90630  
Phone: (714) 229-6752  
waterquality@cypressca.org

**Eileen Sobeck**, Executive Director, *State Water Resources Control Board*  
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828  
Phone: (916) 341-5183  
Eileen.Sobeck@waterboards.ca.gov

**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

**Evelyn Tseng**, *City of Newport Beach*  
100 Civic Center Drive, Newport Beach, CA 92660  
Phone: (949) 644-3127  
etseng@newportbeachca.gov

**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

**Antonio Velasco**, Revenue Auditor, *City of Newport Beach*  
100 Civic Center Drive, Newport Beach, CA 92660  
Phone: (949) 644-3143  
avelasco@newportbeachca.gov

**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

**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

**Juan Zavala**, Principal Engineer, *City of Fullerton*  
Public Works, 303 West Commonwealth Avenue, Fullerton, CA 92832  
Phone: (714) 738-6845  
Juan.Zavala@cityoffullerton.com

**Al Zelinka**, City Manager, *City of Huntington Beach*

**Claimant Contact**

2000 Main St, Huntington Beach, CA 92648

Phone: (714) 375-8465

Al.Zelinka@surfcity-hb.org

**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