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RECEIVED
October 25, 2021
**Commission on
State Mandates**

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October 25, 2021

VIA DROPBOX

Heather Halsey
Executive Director
Commission on State Mandates
980 9th Street, Suite 300
Sacramento, CA 95814

Re: ***Municipal Storm Water and Urban Run-Off Discharges, 03-TC-04, 03-TC-20, 03-TC-21; Los Angeles Regional Water Control Board Order No. 01-182, Permit CAS004001, Part 4F5c3***: County of Los Angeles Comments on Proposed Statewide Cost Estimate

Dear Ms. Halsey:

The County of Los Angeles hereby submits the following comments on the proposed Statewide Cost Estimate:

It is appropriate for the Statewide Cost Estimate to acknowledge that the Commission's decisions on the Incorrect Reduction Claims (IRCs) in this matter are still subject to court review.

Accordingly, the County supports inclusion of the statement on Page 14 of the Draft Cost Estimate that "The local agencies may challenge the Commission's decisions on the IRCs in court by filing a petition for writ of mandate pursuant to Govt. Code section 17559(b)." The County further supports the Draft Cost Estimate's inclusion of a cost estimate range that recognizes that the amount to fund the mandate will be higher should be Commission's decisions on the IRCs be reversed by a court.

Very truly yours,



Howard Gest

HDG:da

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.

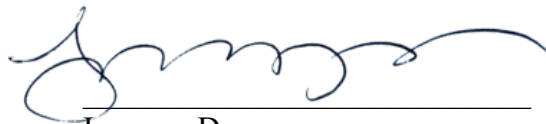
On October 26, 2021, I served the:

- **Current Mailing List dated October 15, 2021**
- **County of Los Angeles' Comments on the Draft Proposed Statewide Cost Estimate filed October 25, 2021**

Municipal Stormwater and Urban Runoff Discharges, 03-TC-04, 03-TC-20, 03-TC-21
Los Angeles Regional Water Quality Control Board Order No. 01-182, Permit
CAS004001, Part 4F5c3

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 October 26, 2021 at Sacramento, California.



Lorenzo Duran
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/15/21

Claim Number: 03-TC-04, 03-TC-19, 03-TC-20, 03-TC-21

Matter: Municipal Stormwater and Urban Runoff Discharges

Claimants: City of Artesia
City of Azusa
City of Bellflower
City of Beverly Hills
City of Carson
City of Commerce
City of Covina
City of Downey
City of Monterey Park
City of Norwalk
City of Rancho Palos Verdes
City of Signal Hill
City of Vernon
City of Westlake Village
County of Los Angeles

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

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

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