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**Commission on  
State Mandates**

October 14, 2024

**VIA DROP BOX**

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

**Comments on Draft Proposed Decision and Parameters and Guidelines and on Claimants' Written Comments and Proposed Reasonable Reimbursement Methodologies. San Diego Regional Water Quality Control Board, Order No. R9-2007-001, Test Claim 07-TC-09-R.**

Dear Director Halsey:

On July 27, 2023, the Commission issued a Draft Proposed Decision and Parameters and Guidelines, Schedule for Comments, and Notice of Hearing in the above-captioned matter. On March 29, 2024, the Commission approved a written stipulation of the parties to extend the time by six months for claimants to submit written comments and proposed reasonable reimbursement methodologies (RRMs), and a further six months for the Department of Finance (Finance), the Water Boards and the State Controller's Office to review, file comments on and make objections to claimants' comments and proposed RRM.

Claimants filed comments and the proposed RRM on February 20, 2024.<sup>1</sup> Comments were also filed by claimants on February 16, 2024.<sup>2</sup> The Commission set a deadline of September 30, 2024, for Finance, the Water Boards and the State Controller's Office to file their comments, and thereafter granted a two-week extension of time to file comments, until October 14, 2024. Finance submits the following comments in opposition to the proposed RRM and claimants' various arguments and requests.

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<sup>1</sup> This filing was submitted by the municipal claimants, which include County of San Diego and the Cities of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, La Mesa, National City, Oceanside, San Diego, and Vista.

<sup>2</sup> This filing was submitted by the special district claimants which are the San Diego County Regional Airport Authority and the San Diego Unified Port District.

Finance also joins in the comments filed by the Water Boards.

The Commission should reject the proposed RRM in their entirety because they fail to meet the statutory requirements for adoption of an RRM and would result in reimbursements in excess of what is required by law. Additionally, the Commission should deny claimants' requests to delete references to Chapter 536, Statutes of 2017 (SB 231), from the proposed decision and should continue to deny the additional reimbursement claimants contend is reasonably necessary for the performance of the mandated activities. And finally, the Commission should not alter its correct conclusion that the special district claimants are ineligible for mandate reimbursement.

Claimants' failure to meet the statutory requirements for the adoption of an RRM demonstrates that, while an RRM may be an appropriate tool in some other circumstance, it is not appropriate for the stormwater permits that are the subject of this mandate claim. As explained below and in the Water Boards' comments, numerous limited-term stormwater permits are issued to a wide variety of permittees with differing sizes, geographic considerations, and other operational issues specific to each permittee. In addition, each permit is individually tailored to each jurisdiction as required by the federal Clean Water Act and many of its requirements change each time a new permit is issued. Finally, only portions of the permit have been deemed reimbursable but those activities may be performed differently by the various permittees, which may have different costs and offsetting revenues. Thus, there is no commonality or consistency that would allow the Commission to fairly balance the presumed simplicity of the proposed RRM with any assurance of accuracy.

### **The Commission Should Reject the Proposed RRM**

#### *The Parameters and Guidelines Should Require Evidence of Actual Costs*

For all of the reasons articulated by the Water Boards and as stated herein, the Commission should reject claimants' proposed RRM. The statutory requirements of Government Code section 17518.5 have not been satisfied and the Parameters and Guidelines should require claimants to submit evidence of their actual costs. All of the permit's required activities have already been performed, and claimants know the costs that have actually been incurred to implement the permit activities. Only reliance on claimed costs supported by source documents created at or near the time the actual costs were incurred, together with corroborating evidence, will ensure that reimbursement is not in excess of what is required by law.

Furthermore, the evidence shows that claimants may have additional offsetting revenues that must be accounted for. The differences in revenues and costs among the various claimants are reason enough to reject a one-size-fits-all approach to reimbursement. Claimants must submit actual costs claims identifying all offsetting revenues and deduct those revenues from the costs submitted for reimbursement. And the individualized nature of these permits makes it essential to ensure that the

State Controller has the opportunity to audit and reduce claims as appropriate.

*The Requirements for Adoption of a Reasonable Reimbursement Methodology Have Not Been Met*

Pursuant to Government Code section 17557, the Commission may adopt an RRM that balances accuracy with simplicity, and that meets the requirements set forth in Government Code section 17518.5, subdivisions (b) – (d) as follows:

(b) A reasonable reimbursement methodology shall be based on cost information from a representative sample of eligible claimants, information provided by associations of local agencies and school districts, or other projections of local costs.

(c) A reasonable reimbursement methodology shall consider the variation in costs among local agencies and school districts to implement the mandate in a cost-efficient manner.

(d) Whenever possible, a reasonable reimbursement methodology shall be based on general allocation formulas, uniform cost allowances, and other approximations of local costs mandated by the state, rather than detailed documentation of actual local costs. In cases when local agencies and school districts are projected to incur costs to implement a mandate over a period of more than one fiscal year, the determination of a reasonable reimbursement methodology may consider local costs and state reimbursements over a period of greater than one fiscal year, but not exceeding 10 years.

None of the above requirements are met by claimants' proposed RRMs. Claimants do not identify which individual claimants make up a representative sample of eligible claimants. Eligible claimants vary widely in their size, populations, and other characteristics. For example, the City of San Diego has a population of approximately 1.4 million residents compared to the City of Del Mar's population of approximately 4,000 residents. The wide variation in characteristics amongst claimants results in a wide variation in costs.

The proposed RRMs also fail to consider the variation in costs among local agencies and make no specific references to how this variation is accounted for. For example, many of the proposed RRMs' components are based on an individual claimant's percentage share of a "total stormwater budget." There is nothing in the supporting documentation to validate that the proposed percentage share of a total stormwater budget is even generally representative of any historic annual expenditures from any claimant, which could otherwise be determined if actual historic expenditures were provided. Further, the activities included in the category "total stormwater budgets" can vary widely among claimants as to what costs are included or not included, and there is no identification and analysis provided for how the RRMs consider that variation.

Crucially, while claimants submitted 14 volumes and 80,000 pages of supporting documents, they did not include sufficient and complete information on the datasets, calculations, and methodologies used to develop the proposed RRM. Finance was unable to determine which information in the supporting documents was used to develop or inform the RRM, or which information was excluded and why it was excluded. It does not appear possible to reproduce the methodologies to determine how they were derived, or compare whether they are accurate and representative, and as such, the reimbursement estimates and proposed RRM cannot be validated.

Moreover, the proposed RRM do not demonstrate that all of the costs to implement the activities are properly limited to only those costs for the activities that were determined to be reimbursable by the Commission. Adoption of an RRM incorporating reimbursement for unapproved activities would therefore result in reimbursement by the state in excess of what is required by article XIII B, section 6.

### **References to SB 231 Should Not Be Deleted**

Claimants ask the Commission to delete portions of the proposed decision relating to SB 231, asserting that it is not relevant to the test claim and the proposed decision should not address it. The Commission should deny claimants' request.

SB 231 amended the definition of "sewer" to include stormwater sewers within the meaning of article XIII D. Under SB 231, local governments, including claimants, may use their constitutional police powers to impose stormwater fees on property owners subject only to the voter protest provisions of article XIII D. There are no costs mandated by the state when a local government has the authority to levy service charges, fees, or assessments sufficient to pay for a mandated program.

SB 231 was central to the question of fee authority in *Department of Finance v. Commission on State Mandates* (2022) 85 Cal.App.5th 535. Although the court declined to apply it retroactively from the date of its enactment, SB 231 is relevant to this test claim to the extent that permit activities have been performed after December 31, 2017. Finance agrees with the finding in the proposed decision that after December 31, 2017, there are no costs mandated by the state and any reimbursement under this test claim or a subsequent one must end.

### **No Additional Reimbursement Should Be Allowed**

Claimants assert that additional activities should be reimbursable if the RRM are not adopted. They again ask the Commission to approve reasonably necessary activities related to the development of policies and procedures for reporting certain activities and for the development of educational programs. The proposed decision analyzed each of these requests and determined that there is not substantial evidence in the record explaining why these activities are necessary to perform the mandate. Claimants continue to argue that these activities should be reimbursable, yet there is

still insufficient evidence that they are reasonably necessary to comply with the approved mandated activities. The Commission should therefore reject claimants' request.

Claimants also ask the Commission to allow them to "recover any owed interest from the reimbursements, as well as recoverable legal and expert costs to process the Test Claim." This request must be denied. Nothing in article XIII B, section 6, or any of the implementing statutes or regulations authorize the Commission to allow a claimant to recover interest or costs to pursue their test claim.

### **The Special District Claimants are Not Eligible for Mandate Reimbursement**

Claimants ask the Commission to reconsider its finding that the special district claimants are not eligible claimants. They argue that the special districts need not be subject to the Constitution's tax-and-spend requirements, that the Airport Authority has the power to levy taxes, and that "equity" requires the special districts receive mandate reimbursement. The Commission should reject each of these arguments.

First, Government Code section 17559 and California Code of Regulations, title 2, section 1187.15, provide that the Commission may order a reconsideration of all or part of a test claim on petition of any party, but the Commission's power to order a reconsideration or to amend a test claim decision expires 30 days after the adopted statement of decision has been served. Further, any request for reconsideration must be certified, filed and served in accordance with the Commission's regulations.

Claimants filed no such petition with the Commission following the originally-issued test claim decision finding the special district claimants are not eligible for mandate reimbursement. Instead, claimants attempt to use the process for filing comments at the parameters and guidelines stage to request the Commission reconsider and modify its decision. Claimants' request is untimely and fails to follow the required procedures for requesting the Commission reconsider and modify its adopted test claim decision. The Commission does not have jurisdiction to reconsider and modify its prior final decision and should deny claimants' request.<sup>3</sup>

Second, it is well-settled law that to be eligible for mandate reimbursement, a claimant must be 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 must have incurred increased costs paid from their local proceeds of taxes. For the reasons stated by the Commission, the special district claimants are not eligible for mandate reimbursement and the arguments to the contrary must fail.

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<sup>3</sup> Nor may claimants seek the modifications by way of a request for a new test claim decision. Under Government Code section 17570, the Commission may adopt a new test claim decision only upon a showing that the state's mandate liability has been modified based on a subsequent change in law.

Finally, claimants argue that principles of equity require they receive mandate reimbursement. However, eligibility for mandate reimbursement is a question of law and not equity. The Commission must therefore find, as a matter of law, that the special district claimants are not eligible for mandate reimbursement.

## **Conclusion**

For all of the reasons set forth above, Finance urges the Commission to deny claimants' proposed RRM's and to require claimants to submit evidence of actual costs consistent with the Commission's Proposed Decision and Parameters and Guidelines. The Commission should also reject claimants' requests to delete references to SB 231, to allow additional reimbursable activities where there is insufficient evidence they are necessary, and to allow the special district claimants, with no taxing and spending authority, to receive mandate reimbursement. Finance urges the Commission to reject the framework of an RRM as a suitable approach to mandate reimbursement in this and future stormwater permit mandates.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, or belief.

Sincerely,

*Teresa Calvert*

TERESA CALVERT  
Program Budget Manager

## 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 14, 2024, I served the:

- **Current Mailing List dated September 26, 2024**
- **Finance's Comments on the Draft Proposed Decision and Parameters and Guidelines filed October 14, 2024**

*San Diego Regional Water Quality Control Board Order No. R9-2007-0001, Permit CAS0108758, Parts D.3.a.(3)(b)(iii), D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii-vi), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3), E.2.f., E.2.g., F.1., F.2., F.3., I.1., I.2., I.5., J.3.a.(3)(c)(iv)-(viii), (x)-(xv), the first sentence of L.1. as it applies to the newly mandated activities, and L.1.a.(3)-(6), 07-TC-09-R County of San Diego, Cites of Carlsbad, Del Mar, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, San Diego, and Vista, 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 October 14, 2024 at Sacramento, California.



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

## COMMISSION ON STATE MANDATES

### Mailing List

**Last Updated:** 9/26/24

**Claim  
Number:** 07-TC-09-R

**Matter:** San Diego Regional Water Quality Control Board Order No. R9-2007-0001 Permit CAS0108758 Parts D.1.d.(7)-(8), D.1.g., D.3.a.(3), D.3.a.(5), D.5, E.2.f, E.2.g, F.1, F.2, F.3, I.1, I.2, I.5, J.3.a.(3)(c)iv-viii & x-xv, and L.

**Claimants:** City of Carlsbad  
City of Chula Vista  
City of Del Mar  
City of Encinitas  
City of Escondido  
City of Imperial Beach  
City of La Mesa  
City of Lemon Grove  
City of National City  
City of Oceanside  
City of Poway  
City of San Diego  
City of San Marcos  
City of Santee  
City of Solana Beach  
City of Vista

### **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@sdcountry.ca.gov

**Tiffany Allen**, Treasury Manager, *City of Chula Vista*  
**Claimant Contact**

Finance Department, 276 Fourth Avenue, Chula Vista, CA 91910  
Phone: (619) 691-5250  
tallen@chulavistaca.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

**Donna Apar**, Finance Director, *City of San Marcos*  
**Claimant Contact**

1 Civic Center Drive, San Marcos, CA 92069  
Phone: (760) 744-1050  
dapar@san-marcos.net

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

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

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

**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

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

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

**Molly Brennan**, Director of Finance, *City of National City*  
**Claimant Contact**  
1243 National City Blvd., National City, CA 91950  
Phone: (619) 336-4330  
finance@nationalcityca.gov

**Serena Bubenheim**, Assistant Chief Financial Officer, *City of Huntington Beach*  
2000 Main Street, Huntington Beach, CA 92648  
Phone: (714) 536-5630  
serena.bubenheim@surfcity-hb.org

**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

**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

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

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

**Erika Cortez**, Administrative Services Director, *City of Imperial Beach*  
**Claimant Contact**  
825 Imperial Beach Boulevard, Imperial Beach, CA 91932  
Phone: (619) 423-8303  
ecortez@imperialbeachca.gov

**Eric Dargan**, Chief Operating Officer, *City of San Diego*  
**Claimant Contact**  
City Hall, 202 C Street, Suite 901A, San Diego, CA 92101  
Phone: (858) 236-5587  
Edargan@sandiego.gov

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

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

**Tracy Drager**, Auditor and Controller, *County of San Diego*

**Claimant Contact**

1600 Pacific Highway, Room 166, San Diego, CA 92101

Phone: (619) 531-5413

tracy.drager@sdcountry.ca.gov

**Eric Feller**, *Commission on State Mandates*

980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562

eric.feller@csm.ca.gov

**Donna Ferebee**, *Department of Finance*

915 L Street, Suite 1280, Sacramento, CA 95814

Phone: (916) 445-8918

donna.ferebee@dof.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

**David Gibson**, Executive Officer, *San Diego Regional Water Quality Control Board*

9174 Sky Park Court, Suite 100, San Diego, CA 92123-4340

Phone: (858) 467-2952

dgibson@waterboards.ca.gov

**Juliana Gmur**, *Commission on State Mandates*

980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562

juliana.gmur@csm.ca.gov

**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

**Shawn Hagerty**, *Best Best & Krieger, LLP*  
San Diego Office, 655 West Broadway, 15th Floor, San Diego, CA 92101  
Phone: (619) 525-1300  
Shawn.Hagerty@bbklaw.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

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

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

**Christina Holmes**, Director of Finance, *City of Escondido*  
**Claimant Contact**  
201 North Broadway, Escondido, CA 92025  
Phone: (760) 839-4676  
cholmes@escondido.org

**Rachel Jacobs**, Finance Director/Treasurer, *City of Solana Beach*  
**Claimant Contact**  
635 South Highway 101, Solana Beach, CA 92075-2215  
Phone: (858) 720-2463  
rjacobs@cosb.org

**Heather Jennings**, Director of Finance, *City of Santee*  
**Claimant Contact**  
10601 Magnolia Avenue, Building #3, Santee, CA 92071  
Phone: (619) 258-4100  
hjennings@cityofsanteeca.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

**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

**Zach Korach**, Finance Director, *City of Carlsbad*  
**Claimant Contact**  
1635 Faraday Ave., Carlsbad, CA 92008  
Phone: (442) 339-2127  
zach.korach@carlsbadca.gov

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

**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

**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

**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

**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

**Tim McDermott**, Director of Finance, *City of Poway*  
13325 Civic Center Drive, Poway, CA 92064

Phone: (858) 668-4411  
tmcdermott@poway.org

**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

**Monica Molina**, Finance Manager/Treasurer, *City of Del Mar*

**Claimant Contact**

1050 Camino Del Mar, Del Mar, CA 92014  
Phone: (858) 755-9354  
mmolina@delmar.ca.us

**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

**Tim Nash**, Director of Finance, *City of Encinitas*

**Claimant Contact**

505 S Vulcan Avenue, Encinitas, CA 92054  
Phone: N/A  
finmail@encinitasca.gov

**Kaleb Neufeld**, Assistant Controller, *City of Fresno*

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

**Andy Nichols**, *Nichols Consulting*

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

**Dale Nielsen**, Director of Finance/Treasurer, *City of Vista*

**Claimant Contact**

Finance Department, 200 Civic Center Drive, Vista, CA 92084  
Phone: (760) 726-1340  
dnielsen@ci.vista.ca.us

**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

**Frederick Ortlieb**, Senior Deputy City Attorney, *City of San Diego*  
1200 Third Avenue, 11th Floor, San Diego, CA 92101  
Phone: (619) 236-6318  
fortlieb@sandiego.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

**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

**Helen Holmes Peak**, *Lounsbery Ferguson Altona & Peak, LLP*  
960 Canterbury Place, Ste. 300, Escondido, CA 92025  
Phone: (760) 743-1201  
hhp@lfap.com

**Brian Pierik**, *Burke, Williams & Sorensen, LLP*  
2310 East Ponderosa Drive, Suite 25, Camarillo, CA 93010-4747  
Phone: (805) 987-3468  
bpierik@bwslaw.com

**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

**Marco Rodriguez**, Accounting Analyst, *City of Lemon Grove*  
3232 Main Street, Lemon Grove, CA 91945  
Phone: (619) 825-3822  
mrodriguez@lemongrove.ca.gov

**Lydia Romero**, City Manager, *City of Lemon Grove*  
**Claimant Contact**  
3232 Main Street, Lemon Grove, CA 91945  
Phone: (619) 825-3819  
lromero@lemongrove.ca.gov

**Tammi Royales**, Director of Finance, *City of La Mesa*  
**Claimant Contact**  
8130 Allison Avenue, PO Box 937, La Mesa, CA 91944-0937  
Phone: (619) 463-6611  
findir@cityoflamesa.us

**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

**Alex Sauerwein**, Attorney, *State Water Resources Control Board*  
San Diego Regional Water Quality Control Board, 1001 I Street, 22nd Floor,  
Sacramento, CA 95814  
Phone: (916) 327-8581  
Alex.Sauerwein@waterboards.ca.gov

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

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

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

**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

**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

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

**Julie Testa**, Vice Mayor, *City of Pleasanton*  
123 Main Street PO Box520, Pleasanton, CA 94566  
Phone: (925) 872-6517  
Jtesta@cityofpleasantonca.gov

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

**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

**Matthew Vespi**, Chief Financial Officer, *City of San Diego*  
202 C Street, 9th Floor, San Diego, CA 92101  
Phone: (619) 236-6218  
mvespi@sandiego.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

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

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

**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

**R. Matthew Wise**, Supervising Deputy Attorney General, *Department of Justice*  
Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255,  
Sacramento, CA 94244-2550  
Phone: (916) 210-6046  
Matthew.Wise@doj.ca.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

**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

**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