CALIFORNIA Water Boards

GAVIN NEWSOM GOVERNOR

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State Water Resources Control Board



November 4, 2022

**VIA DROP BOX**

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

**COMMENTS OF THE STATE WATER RESOURCES CONTROL BOARD AND CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SANTA ANA REGION**

Draft Proposed Decision on *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and XVIII*, 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

Dear Ms. Halsey:

The State Water Resources Control Board (State Water Board) and California Regional Water Quality Control Board, Santa Ana Region (Santa Ana Water Board) (collectively, Water Boards) have reviewed the Draft Proposed Decision dated August 17, 2022, for the above-referenced Test Claim. The Water Boards appreciate the careful and thoughtful work of the Commission on State Mandates (Commission) staff and concur with many of the conclusions reached in the Draft Proposed Decision. The Water Boards support the Draft Proposed Decision's recommendation that the Commission deny the Test Claim. The Water Boards disagree, however, with proposed findings (1) that development of a Cooperative Watershed Program to implement the Selenium TMDL is a state mandate, and (2) that Proposition 218's voter approval provisions divest claimants of fee authority sufficient as a matter of law for the period prior to January 1, 2018. The Water Boards address these points below.

As a preliminary matter, the Draft Proposed Decision finds certain requirements are new and potentially subject to reimbursement for the period May 22, 2009, through December 31, 2017, but would deny the test claim because there is not substantial

evidence in the record that the claimants were forced to spend their local proceeds of taxes within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514. The Water Boards agree there is not substantial evidence in the record. It is unclear to the Water Boards, however, whether this determination in the Draft Proposed Decision is meant to serve as an invitation for the claimants to submit such evidence at this late stage, which would be more than a decade since the Test Claim was filed and initially determined by the Commission to be complete. If the Commission allows claimants to submit supplemental late evidence designed to make such a demonstration now, and is inclined to modify the Draft Proposed Decision as a result, the Water Boards request a reasonable opportunity to evaluate such evidence, comment on its sufficiency, and respond in writing to any revised proposed decision prior to the hearing on this matter.

## I. The requirement in Section XVIII.B.8 to develop a Cooperative Watershed Program implementing the Selenium TMDL is not a state mandate

Section IV.B.1.d.i of the Draft Proposed Decision concludes that Section XVIII.B.8 of the test claim permit contains a state mandate requiring the claimants to develop and submit a Cooperative Watershed Program for selenium.[1] But the Commission comes to a different conclusion in Section IV.B.1.d.ii of the Draft Proposed Decision regarding the implementation of the Cooperative Watershed Program, reasoning that because Section XVIII.B.8 of the test claim permit leaves the manner of TMDL compliance with the Selenium TMDL up to the permittees' discretion, there is no state mandate.[2] The Commission should extend this analysis and find that neither the implementation nor development of the Cooperative Watershed Program constitutes a state mandate.

As the Commission correctly recounts, the Santa Ana Water Board included the Cooperative Watershed Program compliance option at the claimants' urging in order to effectively deploy limited resources during the development and approval of replacement TMDLs for nitrogen and selenium.[3] Accordingly, Section XVIII.B.8 of the test claim permit provides, in part, that:

> The stakeholders have initiated pilot studies to determine the most efficient methods for treatment and removal of selenium. Through the Nitrogen and Selenium Management Program, the watershed stakeholders are developing comprehensive selenium (and nitrogen) management plans, which are expected to form the basis, or at least, in part, for the selenium implementation plan (and a revised nutrient TMDL implementation plan).

Thus, the Cooperative Watershed Program compliance option was designed to offer claimants the opportunity to continue this work instead of spending time and energy on

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[1] Draft Proposed Decision, pp. 120-123.

[2] *Id.*, p. 124.

[3] *Id.*, p. 115. See also Santa Ana Water Board Test Claim Response, Mar. 9, 2011, pp. 30-31.

outdated wasteload allocations (WLAs) that would be (and were) replaced in the future. To this end, Section XVIII.B.8 further provides that:

> As long as the stakeholders are participating in and implementing the approved Cooperative Watershed Program, they will not be in violation of this order with respect to the nitrogen and selenium TMDLs for San Diego Creek and Newport Bay.

However, failure to comply with the Cooperative Watershed Program compliance option would necessarily require compliance with existing TMDLs for nitrogen and selenium as set forth in Section XVIII.E of the test claim permit and potentially subject any claimant to individual waste discharge requirements or waivers of waste discharge requirements. The Draft Proposed Decision recognizes this compliance scheme, finding that the requirement to implement the Cooperative Watershed Program is not a state mandate because claimants can choose to achieve compliance in accordance with Section XVIII.E instead of implementing the Cooperative Watershed Program.

Instead of treating the requirement to develop the Cooperative Watershed Program the same way, the Draft Proposed Decision interprets the test claim permit to require the claimants to comply with the existing TMDL for selenium while at the same time preparing the Cooperative Watershed Program. This dual compliance effort is exactly what the claimants and Santa Ana Water Board sought to avoid through Section XVIII.B.8. Considering the Santa Ana Water Board established the revised TMDLs for selenium in 2017,[4] the Commission's interpretation would have required dual compliance efforts for nearly a decade.

The Commission does not explain its reasoning for treating the requirement to develop and submit the Cooperative Watershed Program differently than the requirement to implement it. It may be that the Commission is concerned that Section XVIII.B.8 refers only to "participating in and implementing the approved Cooperative Watershed Program" and not expressly to developing the Cooperative Watershed Program. Considering the context and purpose of the Cooperative Watershed Program compliance option, this language (and the larger provision) should be read broadly to include participating in the development of and the implementation of the approved Cooperative Watershed Program. This is consistent with the intent of this provision and the avoidance of wasted resources in furtherance of improved water quality.

## II. Because claimants can comply with the Section XVIII.B.4 WLAs by participating in the development of a Cooperative Watershed Program, the test claim permit contains no requirement to comply with these WLAs in accordance with Section XVIII.E of the test claim permit

The Draft Proposed Decision finds that the test claim permit requires claimants to comply with the WLAs in Section XVIII.B.4 by monitoring, reevaluating current best

[4] Exhibit X, Regional Board, Resolution 2017-0014, Basin Plan Amendment, Selenium TMDL.

management practices (BMPs) or proposing new BMPs if an exceedance occurs.[5] But, as explained above, the Commission should interpret Section XVIII.B.8 of the test claim permit as allowing compliance with these WLAs through participation in the development of the Cooperative Watershed Program and not just during the implementation of the Cooperative Watershed Program. Accordingly, because claimants can choose whether to comply with the Section XVIII.B.4 WLAs through the process set forth in Section XVIII.E or through participation in the development of the Cooperative Watershed Program, the test claim permit does not require compliance solely in accordance with Section XVIII.E. Therefore, the test claim permit contains no requirement to comply with the WLAs in accordance with Section XVIII.E. of the test claim permit.

## III. Claimants have fee authority within the meaning of Government Code section 17556, subdivision (d)

The Draft Proposed Decision contains extensive discussion of local agency constitutional and statutory authorities to raise fees, including discussion of what has been found to constitute sufficient fee authority as a legal matter within the meaning of Government Code section 17556, subdivision (d). The Water Boards agree with the Draft Proposed Decision's conclusion that claimants have sufficient fee authority as a legal matter based on the reasoning in *Paradise Irrigation District v. Commission on State Mandates* ((2019) 33 Cal.App.5th 174) and the Legislature's enactment of Government Code sections 57350 and 57351 for costs on and after January 1, 2018, and are therefore not entitled to reimbursement for any costs after 2017.[6] Likewise, the Water Boards agree that the record lacks substantial evidence demonstrating that claimants were forced to use local tax proceeds to pay for any increased costs associated with state-mandated requirements.[7]

As explained below, however, the Water Boards *disagree* with the Draft Proposed Decision's conclusion that claimants lack fee authority prior to January 1, 2018, due to

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[5] The Water Boards concur with the Commission's determination that even if this was considered a new requirement, it does not constitute a state mandate. (Draft Proposed Decision, pp. 123-30)

[6] "Based on *Paradise Irrigation District* case and the Legislature's enactment of Government Code sections 57350 and 57351 (which overturned *Howard Jarvis Taxpayers Association v. City of Salinas* (2002) 98 Cal.App.4th 1351), there are no costs mandated by the state on or after January 1, 2018, to comply with the new requirements and develop and submit a proposed Cooperative Watershed Program to comply with the selenium TMDL, the public education program, and the requirement to develop a pilot program to control pollutant discharges from common interest areas and areas managed by homeowner associations or management companies, because claimants have constitutional and statutory authority to charge property-related fees for these costs subject only to the voter protest provisions of article XIII D, which is sufficient as a matter of law to cover the costs of the mandate activities within the meaning of Government Code section 17556(d)." (Draft Proposed Decision, p. 170.)

[7] "There is not substantial evidence in the record, as required by Government Code section 17559, that the claimants have been forced to spend their local 'proceeds of taxes' on the new state-mandated activities and, thus, there is not a sufficient showing of increased costs mandated by the state within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514." (Draft Proposed Decision, p. 169.)

Proposition 218's voter approval provisions.[8] Therefore, even if claimants could submit evidence now to demonstrate they were forced to use local tax proceeds to pay for increased costs from May 22, 2009, through December 31, 2017, claimants had sufficient fee authority as a legal matter under Government Code section 17556, subdivision (d), for the entire test claim period and are entitled to no reimbursement.

### A. A voter approval requirement does not divest claimants of legal authority to impose fees

California courts have consistently held that fee authority is purely a question of legal authorization. (*Connell v. Superior Court* (1997) 59 Cal.App.4th 382, 401 [holding that the focus under Government Code section 17556 is whether a local agency has "authority, i.e., the right or power, to levy fees sufficient to cover the costs:]; *Clovis Unified School Dist. v. Chiang* (2010) 188 Cal.App.4th 794, 812.) "[F]actual considerations of practicality" do not defeat a local agency's fee authority. (*Paradise Irrigation Dist. v. Commission on State Mandates* (2019) 33 Cal.App.5th 174, 195.) The Draft Proposed Decision correctly finds that claimants have authority under their police powers to impose fees in connection with challenged permit provisions.[9] Even where Proposition 218 superimposes a voter approval provision on fees to pay for specific state mandates, claimants' authority nonetheless exists and expenditures for mandates are not reimbursable.

In *Paradise Irrigation District, supra,* the court of appeal considered whether the majority protest procedure added by Proposition 218 deprived local agencies of authority to impose fees for water service. (33 Cal.App.5th at p. 182.) California Constitution, Article XIII D, section 6(a), requires a local agency to identify parcels subject to a new fee, calculate the fee amount, and provide notice to affected property owners. (Art. XIII D, § 6, subd. (a)(1).) If a majority of the property owners submit written protests against the fee, the fee may not be imposed. (*Id.,* subd. (a)(2).)

The *Paradise Irrigation District* court held that the "majority protest procedures are properly construed as a power-sharing arrangement between the districts and their customers, rather than a deprivation of fee authority." (33 Cal.App.5th at p. 182.) It explained that, when considering how voter powers affect the ability of local

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[8] "Based on *Howard Jarvis Taxpayers Association v. City of Salinas* (2002) 98 Cal.App.4th 1351, and consistent with the prior decision of the Commission in *Discharge of Stormwater Runoff,* 07-TC-09 and the Sacramento Superior Court in *Department of Finance v. Commission on State Mandates* (Case No. 34-2010-80000604), to the extent that fees requiring voter approval were the only fees available to fund these requirements from May 22, 2009, the beginning date of the potential period of reimbursement, to December 31, 2017, and the claimants were unable to pass the fees during that time due to the voter approval requirement, the fee authority is not sufficient as a matter of law to fund the costs of the mandated activities [fn]. Under these limited circumstances, Government Code section 17556(d) does not apply. *However,* as indicated above, there is not substantial evidence in the record that the claimants were forced to use their proceeds of taxes to pay for these requirements and, thus, the Commission cannot find costs mandated by the state for these activities during this time period." (Draft Proposed Decision, p. 170.)

[9] Draft Proposed Decision, pp. 178-179, 182-183.

governments to impose fees, courts "presume local voters will give appropriate consideration and deference to state mandated requirements . . . ." (*Id.,* at p. 194, citing *Bighorn-Desert View Water Agency v. Verjil* (2006) 39 Cal.4th 205, 220.) "Although this power-sharing arrangement has the potential for conflict, we must presume that both sides will act reasonably and in good faith." (*Id.,* at p. 192.) Further, the fact that, "as a matter of practical reality, the majority protest procedure allows water customers to defeat the District's authority to levy fees" was not dispositive; "the inquiry into fee authority constitutes an issue of law rather than a question of fact." (*Id.,* at p. 195, citing *Connell, supra,* 59 Cal.App.4th at p. 401.)

The court in *Paradise Irrigation District* did not consider whether a local agency has fee authority as a legal matter where fees or assessments are subject to voter approval requirements. However, the court's reasoning applies with equal force where Proposition 218 requires pre-approval by a majority vote of the affected property owners (or, alternatively, by a two-thirds vote of the electorate). That the governing body of a municipality (e.g., County Board of Supervisors or City Council) and the affected property owners who elected that body share power to impose fees does not mean claimants are deprived of fee authority under Government Code section 17556. And the fact that property owners in claimants' local jurisdictions could theoretically withhold approval—just as a majority of the governing body could theoretically withhold approval to impose a fee—does not undermine claimants' police power. That power exists regardless of what the property owners, or the governing body, might decide about any given fee.

Under Proposition 218, local property owners share the power to impose certain fees with their governing bodies. This more direct governance process does not deprive a local agency of any fee authority, the local agency simply shares that authority with affected property owners or voters. Such property owners or voters are considered part of the legislating body, a body that has legal fee authority required by Government Code section 17556.

The Draft Proposed Decision concludes, "the background rule from these cases is that where the claimant 'has authority, i.e., the right or power, to levy fees sufficient to cover the costs' of a state mandated program, reimbursement is not required, notwithstanding other factors that may make the exercise of that authority impractical or undesirable."[10] Whether a fee is subject to voter approval (which may be withheld) or majority protest (which can defeat a fee), there is the same potential practical result that the local agency will be unable to collect the desired fee. Since the same potential outcome can result from either power-sharing mechanism, there is no compelling reason to find fee authority exists in one mechanism but not the other. Voter approval provisions, like voter protest provisions, may complicate the exercise of fee authority, but they do not negate it.

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[10] Draft Proposed Decision, p. 181, citing *County of Fresno v. State of California* (1991) 53 Cal.3d 482, 487; *Connell v. Superior Court* (1997) 59 Cal.App.4th 382.

Further, if elected representatives of governing bodies fail to even propose a fee to voters for consideration, they are depriving voters from exercising any role whatsoever in the shared power arrangement recognized in *Connell, supra, Paradise Irrigation District, supra, and Bighorn Desert-View, supra.*

**B. If the Commission finds that voter approval procedures divest claimants of fee authority for costs prior to January 1, 2018, the Commission should find that claimants cannot establish they are forced to use local proceeds from taxes if they have not sought voter approval for proposed fees**

The Draft Proposed Decision finds:

> [T]o the extent that fees requiring voter approval were the only fees available to fund these [mandated] requirements from May 22, 2009, the beginning date of the potential period of reimbursement, to December 31, 2017, *and the claimants were unable to pass the fees during that time due to the voter approval requirement,* the fee authority is not sufficient as a matter of law to fund the costs of the mandated activities.[11] Under these limited circumstances, Government Code section 17556(d) does not apply. *However,* as indicated above, there is not substantial evidence in the record that claimants were forced to use their proceeds of taxes to pay for these requirements and, thus, the Commission cannot find costs mandated by the state for these activities during this time period.[12]

This proposed finding implicitly recognizes that to demonstrate claimants were *forced* to use their proceeds of taxes to pay for mandated requirements before January 1, 2018, claimants should also have to show they attempted, but failed, to establish the fees due to the voter approval provisions. The Water Boards agree that absent an effort to secure voter approval for proposed fees necessary to pay for state mandated requirements, claimants cannot reasonably make this demonstration.[13] If claimants fail to even attempt to secure voter approval, such as by never bringing a fee proposal to their voters in the first place, they cannot demonstrate that the voter approval provision was an obstacle to imposing necessary fees. Any other conclusion results in the

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[11] Exhibit A, Test Claim filed June 30, 2010, and revised December 19, 2016, and January 3, 2017, pages 316-317, 332-333 [Order No. R8-2009-0030, Section XIII.1, 4, and 7, pages 62-63; Section XI.4, pages 46-47].

[12] Draft Proposed Decision, p. 170 (emphasis added).

[13] See Draft Proposed Decision, p. 27 ["Article XIII B, section 6, of the California Constitution, requires reimbursement only when local governments are compelled by a state mandate to incur costs mandated by the state. The courts have interpreted 'costs' to mean only those expenditures that come from revenues limited by articles XIII A and XIII B (i.e., proceeds of taxes). Therefore, mandate reimbursement is only required if the local government entity is forced to expend the proceeds of taxes" (citing *County of Fresno v. State of California* (1991) 53 Cal.3d 482, 487; *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).]

inequitable situation in which local agencies may decline to seek voter approval for a necessary fee instead choosing to seek reimbursement from the state based on the assertion that the agency lacks fee authority sufficient as a matter of law under Government Code section 17556, subdivision (d).[14] Treating the voter protest and voter approval provisions consistently – with neither divesting local agencies of fee authority – avoids creating an incentive for local agencies to never seek voter approval, even where it may be successful.[15] Likewise, treating voter protest and voter approval provisions in the same manner is consistent with the conclusions in *Connell, supra,* and *Paradise Irrigation District, supra,* that fee authority as a legal matter is not determined by "practical abilities" (*Connell*) or "practical reality" (*Paradise Irrigation District*). Mandates law was never meant to provide local agencies a free ride at the expense of statewide taxpayers.

Here, the claimants provide no evidence that they proposed a fee to their voters and the voters rejected said fee. It is clear from the record in this matter that claimants never even attempted to bring a fee proposal to their voters. Instead, claimants blame voter approval as a hindrance to imposing fees, yet never provided an opportunity for their voters to decide one way or the other.

### C. Claimants are not entitled to any reimbursement for costs for any mandated activities on and after January 1, 2018

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[14] The Draft Proposed Decision acknowledges this incentive on the part of claimants finding sufficient fee authority in the context of development fees: "Here, the claimants have imposed on themselves the opposite incentive: they do not wish to impose new fees, nor establish that such fees do not constitute a tax; instead, they seek mandate reimbursement. They argue the impossibility of imposing or increasing fees, even as *Sinclair Paint* and *616 Croft Ave.* show that the reasonableness and proportionality tests to which courts have subjected other proposed fees do not present such a hurdle as to effectively divest them of the authority to impose fees. In addition, there is ample evidence that the claimants do in fact impose development fees, regulatory fees, and other fees that they have successfully established as fees, rather than taxes, even after the adoption of Propositions 218 and 26." (Draft Proposed Decision, p. 187.)

[15] For example, the Draft Proposed Decision at pages 190-191 recognizes that a stormwater property-related fee could be implemented for state mandates activities on and after January 1, 2018, and cites as an example of such a property-related fee a fee implemented by the City of San Clemente in effect from February 7, 2104 through June 30, 2020.

Other local agencies have recently successfully brought stormwater property-related fees or special taxes to their voters. For example, the City of Sacramento successfully passed a storm drainage property-related fee earlier this year. See Resolution No. 2022-0100, adopted by the Sacramento City Council on April 12, 2022, indicating 52.3% "yes" votes, available at https://www.cityofsacramento.org/-/media/Corporate/Files/DOU/Services-Rates/R2022-0100-Item-08-2022-00667-04122022.pdf?la=en. The County of Los Angeles also successfully brought a measure (Measure W) to its voters during the November 6, 2018 election, which was approved by more than two-thirds (69.45%) of the electorate that voted. See County of Los Angeles Department of Public Works report dated July 30, 2019, p. 2, at https://safecleanwaterla.org/wp-content/uploads/2019/08/SCW-July-30-2019-Board-Package.pdf; Los Angeles County November 6, 2018 Election Results for Measure W at https://results.lavote.gov/#year=2018&election=3861.

The Draft Proposed Decision relies on *Paradise Irrigation District, supra,* and legislative enactment of Government Code sections 57350 and 57351 through Senate Bill No. 231 (SB 231) to find that claimants have "no costs mandated by the state on or after January 1, 2018, to comply with [proposed state mandated requirements] because claimants have constitutional and statutory authority to charge property-related fees for these costs subject only to the voter protest provisions of article XIII D, which is sufficient as a matter of law to cover the costs of the mandated activities within the meaning of Government Code section 17556(d)."[16] In its analysis, the Draft Proposed Decision "presumes the validity of Government Code section 53750 and 53751" in concluding they apply beginning January 1, 2018. Thus, the Draft Proposed Decision finds that on and "after January 1, 2018, storm sewer or storm drainage fees imposed on property owners on property owners are subject only to the majority protest requirement of article XIII D, section 6(a), and the reasonableness and proportionality requirements of section 6(b)."[17]

The Water Boards agree that *Paradise Irrigation District* and Government Code sections 57350 and 57351 make clear that claimants have sufficient fee authority to pay for any mandated costs on or after January 1, 2018. The Commission is also obligated to follow SB 231. Therefore, even if claimants were allowed to offer late supplemental evidence showing that they were forced to spend their local proceeds of tax, claimants are not entitled to any reimbursement for costs for any mandated activities on and after January 1, 2018.

## IV. Conclusion

For the additional reasons set forth above, the Commission should deny the test claim in its entirety.

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

Catherine George Hagan

Catherine George Hagan
Attorney IV
Office of Chief Counsel
State Water Resources Control Board
Tel. 619.521.3012
E-mail Address: catherine.hagan@waterboards.ca.gov

[16] Draft Proposed Decision, p. 170.

[17] Draft Proposed Decision, p. 193.

# 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 November 7, 2022, I served the:

- **Cities of Alameda's and Union City's and Alameda Countywide Clean Water Program's Comments on the Draft Proposed Decision filed November 4, 2022**
- **Claimants' Comments on the Draft Proposed Decision filed November 4, 2022**
- **Finance's Comments on the Draft Proposed Decision filed November 4, 2022**
- **Water Boards' Comments on the Draft Proposed Decision filed November 4, 2022**

  *California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, Sections IX, X, XI, XII, XIII, and, XVIII*, 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 November 7, 2022 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:** 10/28/22

**Claim Number:** 09-TC-03

**Matter:** California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030

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

**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

**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@cityofsthelena.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**
624 South Grand Avenue, Suite 2200, Los Angeles, CA 90017
Phone: (213) 629-8788
dburhenn@burhenngest.com

**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

**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
achinncrs@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

**Frank Davies**, Auditor-Controller, *County of Orange*

**Claimant Contact**
1770 North Broadway, Santa Ana, CA 92701
Phone: (714) 834-2450
Frank.Davies@ac.ocgov.com

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

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

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

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

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

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

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

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

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

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

**Howard Gest**, *Burhenn & Gest,LLP*
624 South Grand Avenue, Suite 2200, Los Angeles, CA 90402
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
khb@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

**Sunny Han**, Project Manager, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5907
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

**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

**Alison Leary**, Deputy General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8200
aleary@cacities.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

**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

**Corrie Manning**, Assistant General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8200
cmanning@cacities.org

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

**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

**Geoffrey Neill**, Senior Legislative Analyst, Revenue & Taxation, *California State Association of Counties (CSAC)*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
gneill@counties.org

**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**, *Artiano Shinoff*
2488 Historic Decatur Road, Suite 200, San Diego, CA 92106
Phone: (619) 232-3122
apalkowitz@as7law.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

**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

**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@csm.ca.gov

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

**Wayne Shimabukuro**, *County of San Bernardino*
Auditor/Controller-Recorder-Treasurer-Tax Collector, 222 West Hospitality Lane, 4th Floor, San Bernardino, CA 92415-0018
Phone: (909) 386-8850
wayne.shimabukuro@atc.sbcounty.gov

**Jennifer Shook**, *County of Orange - OC Public Works Department*
OC Watersheds Program - Stormwater External, 2301 N. Glassell Street, Orange, CA 92865
Phone: (714) 955-0671
jennifer.shook@ocpw.ocgov.com

**Natalie Sidarous**, Chief, *State Controller's Office*
Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA

95816
Phone: 916-445-8717
NSidarous@sco.ca.gov

**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

**Christina Snider**, Senior Deputy County Counsel, *County of San Diego*
1600 Pacific Highway, Room 355, San Diego, CA 92101
Phone: (619) 531-6229
Christina.Snider@sdcounty.ca.gov

**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

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

**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

**Michael Vigliotta**, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5555
MVigliotta@surfcity-hb.org

**Emel Wadhwani**, Senior Staff Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, Sacramento, CA 95814
Phone: (916) 322-3622
emel.wadhwani@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

**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