



November 27, 2024

Mr. Howard Gest
Burhenn & Gest, LLP
12401 Wilshire Blvd, Suite 200
Los Angeles, CA 90025

Ms. Anne Kato
State Controller's Office
Local Government Programs and
Services Division
3301 C Street, Suite 740
Sacramento, CA 95816

And Parties, Interested Parties, and Interested Persons (See Mailing List)

**Re: Draft Proposed Statewide Cost Estimate, Schedule for Comments,
and Notice of Hearing**
*California Regional Water Quality Control Board, San Diego Region,
Order No. R9-2009-0002, Sections D.2.; F.1.d.7.i.; F.4.b.; G.6.; K.1.b.4.n.;
K.3.a.3.c.; J.1.; J.3.; J.4.; and Attachment D, Section D-2,
Adopted December 16, 2009, 10-TC-11*

Dear Mr. Gest and Ms. Kato:

The Draft Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review and comment.

Written Comments

Written comments may be filed on the Draft Proposed Statewide Cost Estimate not later than **5:00 p.m. on December 9, 2024**. You are advised that comments filed with the Commission are required to be electronically filed (e-filed) in an unlocked legible and searchable PDF file, using the Commission's Dropbox. (Cal. Code Regs., tit. 2, § 1181.3(c)(2).) Refer to <https://www.csm.ca.gov/dropbox.shtml> on the Commission's website for electronic filing instructions. If e-filing would cause the filer undue hardship or significant prejudice, filing may occur by first class mail, overnight delivery or personal service only upon approval of a written request to the executive director. (Cal. Code Regs., tit. 2, § 1181.3(c)(3).)

Hearing

This matter is set for hearing on **January 24, 2025, in person at 10:00 a.m., at Park Tower, 980 9th Street, Suite 300, Sacramento, California, 95814 and via Zoom.**

The Proposed Statewide Cost Estimate will be issued on or about January 10, 2025.

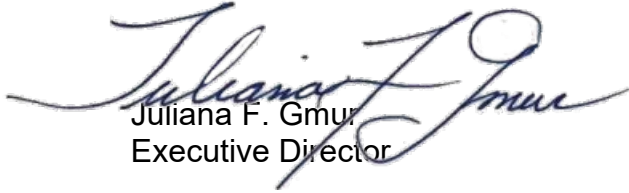
This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on the Consent Calendar.

Please also notify Commission staff not later than the Wednesday prior to the hearing that you or a witness you are bringing plan to testify and please specify the names of the people who will be speaking for inclusion on the witness list.

Mr. Gest and Ms. Kato
November 27, 2024
Page 2

The last communication from Commission staff will be the Proposed Statewide Cost Estimate, which will be issued approximately 2 weeks prior to the hearing, and it is incumbent upon the participants to let Commission staff know if they wish to testify or bring witnesses.

Very truly yours,



Juliana F. Gmur
Executive Director

ITEM ____
DRAFT PROPOSED STATEWIDE COST ESTIMATE

\$351,870 - \$557,715
Initial Claim Period¹

(December 16, 2009 to December 31, 2017)

*California Regional Water Quality Control Board, San Diego Region,
Order No. R9-2009-0002, Sections D.2., F.1.d.7.i.; F.4.b.; G.6.; K.1.b.4.n.;
K.3.a.3.c.; J.1.; J.3.; J.4.; and Attachment D, Section D-2.*

10-TC-11

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on January 24, 2025 as follows:

Member	Vote
Lee Adams, County Supervisor	
Shannon Clark, Representative of the Director of the Governor's Office of Land Use and Climate Innovation	
Deborah Gallegos, Representative of the State Controller	
Karen Greene Ross, Public Member	
Renee Nash, School District Board Member	
William Pahland, Representative of the State Treasurer, Vice Chairperson	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	

¹ The entire reimbursement period is within the initial claim period because the Commission found the mandate is not reimbursable beginning January 1, 2018 since the claimants have fee authority, sufficient as a matter of law, to pay for the reimbursable activities pursuant to Government Code section 17556(d).

STAFF ANALYSIS

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

This Statewide Cost Estimate addresses state-mandated activities arising from National Pollutant Discharge Elimination System (NPDES) Order No. R9-2009-0002, adopted by the San Diego Regional Water Quality Control Board on December 16, 2009.

The Commission adopted the Test Claim Decision on October 27, 2023, partially approving reimbursement for the copermitees that incur increased costs to perform the reimbursable activities under the mandate, and adopted the Decision and Parameters and Guidelines on January 26, 2024 which were corrected on March 14, 2024. The copermitees are the County of Orange (County), Orange County Flood Control District (District), and cities of Aliso Viejo, Dana Point, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Lake Forest, Mission Viejo, Rancho Santa Margarita, San Clemente, and San Juan Capistrano.²

The initial reimbursement period, which includes the entire reimbursement period, is December 16, 2009, through December 31, 2017 (seven months of fiscal year 2009-2010 through first half of fiscal year 2017-2018).³ Eligible claimants were required to file initial claims with the State Controller's Office (Controller) by August 23, 2024. Late initial reimbursement claims may be filed until August 23, 2025, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.⁴

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

1. Develop a monitoring plan to sample a representative percent of the major outfalls within each hydrologic subarea to determine SAL compliance (*one-time* activity as required by section D.2.).
2. Update the map of the entire MS4 and the corresponding drainage areas within each copermitees' jurisdiction *in GIS format* and submit GIS layers within 365 days of adoption of the permit to the Regional Board (*one-time only*, as required by section F.4.b.)
3. JRMP Effectiveness Assessment and Reporting, and Work Plan to Address High Priority Water Quality Problems (Sections J.1., J.3., and J.4.)
 - a. Establish annual assessment measures for reducing discharges into each downstream 303(d) listed water body and downstream environmentally

² Exhibit B, Decision and Parameters and Guidelines, adopted January 26, 2024, corrected March 14, 2024, page 10.

³ Exhibit B, Decision and Parameters and Guidelines, adopted January 26, 2024, corrected March 14, 2024, page 10.

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

sensitive areas that conform to the six outcome levels developed by CASQA, and which target water quality outcomes and the results of municipal enforcement activities, and to annually assess those measures. (Section J.1.a.)

- b. Include the following effectiveness assessment information within each annual report, beginning with the 2011 annual report:
 - A description and results of the annual assessment measures or methods for reducing discharges of stormwater pollutants from the MS4 into each 303(d) listed waterbody. (Section J.3.a.1.)
 - A description and results of the annual assessment measures or methods for managing discharges of pollutants from the MS4 into each downstream environmentally sensitive area. (Section J.3.a.2.)
 - A description of the steps that will be taken to improve the copermitees' ability to assess program effectiveness using measurable targeted outcomes, assessment measures, assessment methods, and outcome levels 1-6, and include a time schedule for when improvement will occur. (Section J.3.a.8.)
 - c. Develop a work plan to address high priority water quality problems in an iterative manner over the life of the permit. The plan is required to be submitted to the Regional Board within 365 days of the adoption of the test claim permit, and shall be annually updated and included in the annual JRMP report. The work plan shall include the following information (Section J.4):
 - The problems and priorities identified during the assessment.
 - A list of priority pollutants and known or suspected sources.
 - A brief description of the strategy employed to reduce, eliminate or mitigate the negative impacts.
 - A description and schedule for new or modified BMPs. The schedule is to include dates for significant milestones.
 - A description of how the selected activities will address an identified high priority problem, including a description of the expected effectiveness and benefits of the new or modified BMPs.
 - A description of how efficacy results will be used to modify priorities and implementation.
 - A review of past activities implemented, progress in meeting water quality standards, and planned program adjustments. (Section J.4.)
4. Annual JRMP Reports (Section F.1.d.7.i.; K.3.a.3.c., and Attachment D., section D-2., of the test claim permit)

- a. Except for the permittee’s own municipal priority development projects, notify the Regional Board in the annual report of all other priority development projects choosing to participate in the LID waiver program. The annual report must include the following information: name of the developer of the participating priority development project; site location; reason for LID waiver including technical feasibility analysis; description of BMPs implemented; total amount deposited, if any, into the stormwater mitigation fund; water quality improvement projects proposed to be funded; and timeframe for implementation of water quality improvement projects. (Section F.1.d.7.i.)
 - b. Gather and report the following new information in the annual report checklist:
 - Construction - Except for the permittee’s own municipal construction, gather and report number of active sites, number of inactive sites, and number of violations for all other construction.
 - New development - Except for the permittee’s own municipal new development, gather and report the number of development plan reviews, number of grading permits issued, and number of projects exempted from interim/final hydromodification requirements for all other new development.
 - Post construction development – Except for the permittee’s own municipal priority development projects, gather and report the number of priority development projects; and number of SUSMP [standard urban storm water mitigation plans] required post construction BMP violations.
 - MS4 maintenance –amount of waste removed, and total miles of MS4 inspected.
 - Municipal/commercial/industrial – Except for the permittee’s own municipal facilities, gather and report the number of facilities and number of violations. (Section K.3.a.3.c., and Attachment D., section D-2., of the test claim permit.)
5. Annually notice and conduct public meetings to review and update the watershed workplan. (Sections G.6. and K.1.b.4.n.)

Offsetting Revenues and Reimbursements

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

costs of this program, and any funds other than the claimant’s proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.⁵

Offsetting revenues identified in the reimbursement claims totaled \$162,922 for fiscal years 2009-2010 through 2014-2015, which were identified by the County, the principal permittee, and, as explained herein, represent the funds received by the County from the city copermitees to comply with some of the reimbursable activities.

Statewide Cost Estimate

Activities A.1. and A.2. are one-time activities and are expected to end within the first few years of the program. Therefore, all costs for Activities A.1. and A.2. are expected to be claimed for the first few years of the reimbursement period only. Costs for Activities B.1. through B.4., however, are expected to be claimed for the entire reimbursement period ending December 31, 2017.

Staff reviewed 42 unaudited reimbursement claims as compiled by the Controller. The claims submitted by the County and cities of Aliso Viejo, Dana Point, and Mission Viejo covered fiscal years 2009-2010 through 2014-2015. The claims submitted by Rancho Santa Margarita and San Juan Capistrano covered the same fiscal years but excluded 2010-2011. The rest of the cities filed claims for a few fiscal years: Laguna Niguel submitted claims for fiscal years 2009-2010, 2010-2011, and 2012-2013; Lake Forest, fiscal years 2009-2010, 2011-2012, 2012-2013, and 2013-2014; and San Clemente, only fiscal year 2009-2010. Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein. Table 1 below summarizes the cost estimates for all fiscal years, seven months of 2009-2010 through first half of 2017-2018.

Table 1. Reimbursement Period Cost Estimate

A. One-Time Activities	
Activity A.1. Develop a monitoring plan to sample a representative percent of the major outfalls within each hydrologic subarea to determine Storm Water Action Level (SAL) compliance (Section D.2.).	\$18,454 - \$26,654
Activity A.2. Update the map of the entire Municipal Separate Storm Sewer System (MS4) and the corresponding drainage areas within each copermitees’ jurisdiction in Geographic Information System (GIS) format and submit GIS layers within 365 days of adoption of the permit to the Regional Board (Section F.4.b).	\$65,621 - \$94,785
B. Ongoing Activities	

⁵ Exhibit B, Decision and Parameters and Guidelines, adopted January 26, 2024, corrected March 14, 2024, pages 13-14.

<p>Activity B.1.a. Establish annual assessment measures for reducing discharges into each downstream 303(d) listed water body and downstream environmentally sensitive areas that conform to the six outcome levels developed by California Stormwater Quality Association (CASQA), and which target water quality outcomes and the results of municipal enforcement activities, and to annually assess those measures. (Section J.1.a.)</p>	<p>\$178,620 - \$258,008</p>
<p>Activity B.1.b. Include the following effectiveness assessment information within each annual report, beginning with the 2011 annual report:</p> <ul style="list-style-type: none"> • A description and results of the annual assessment measures or methods for reducing discharges of stormwater pollutants from the MS4 into each 303(d) listed waterbody. (Section J.3.a.1.) • A description and results of the annual assessment measures or methods for managing discharges of pollutants from the MS4 into each downstream environmentally sensitive area. (Section J.3.a.2.) • A description of the steps that will be taken to improve the copermittees' ability to assess program effectiveness using measurable targeted outcomes, assessment measures, assessment methods, and outcome levels 1-6, and include a time schedule for when improvement will occur. (Section J.3.a.8.) 	<p>\$45,394 - \$65,570</p>
<p>Activity B.2. Develop a work plan to address high priority water quality problems in an iterative manner over the life of the permit. The plan is required to be submitted to the Regional Board within 365 days of the adoption of the test claim permit, and shall be annually updated and included in the annual JRMP report. The work plan shall include the following information (Section J.4):</p> <ul style="list-style-type: none"> • The problems and priorities identified during the assessment. • A list of priority pollutants and known or suspected sources. • A brief description of the strategy employed to reduce, eliminate or mitigate the negative impacts. 	<p>\$167,152 - \$241,440</p>

<ul style="list-style-type: none"> • A description and schedule for new or modified BMPs. The schedule is to include dates for significant milestones. • A description of how the selected activities will address an identified high priority problem, including a description of the expected effectiveness and benefits of the new or modified BMPs. • A description of how efficacy results will be used to modify priorities and implementation. • A review of past activities implemented, progress in meeting water quality standards, and planned program adjustments. (Section J.4.) 	
<p>Activity B.3.a. Except for the permittee’s own municipal priority development projects, notify the Regional Board in the annual report of all other priority development projects choosing to participate in the Low Impact Development (LID) waiver program. The annual report must include the following information: name of the developer of the participating priority development project; site location; reason for LID waiver including technical feasibility analysis; description of BMPs implemented; total amount deposited, if any, into the stormwater mitigation fund; water quality improvement projects proposed to be funded; and timeframe for implementation of water quality improvement projects. (Section F.1.d.7.i.)</p>	\$0 - \$0
<p>Activity B.3.b. Gather and report the following new information in the annual report checklist:</p> <ul style="list-style-type: none"> • Construction - Except for the permittee’s own municipal construction, gather and report number of active sites, number of inactive sites, and number of violations for all other construction. • New development - Except for the permittee’s own municipal new development, gather and report the number of development plan reviews, number of grading permits issued, and number of projects exempted from interim/final hydromodification requirements for all other new development. • Post construction development - Except for the permittee’s own municipal priority development projects, gather and report the number of priority development 	\$6,167 - \$8,907

<p>projects; and number of SUSMP [standard urban storm water mitigation plans] required post construction BMP violations.</p> <ul style="list-style-type: none"> • MS4 maintenance - amount of waste removed, and total miles of MS4 inspected. • Municipal/commercial/industrial - Except for the permittee's own municipal facilities, gather and report the number of facilities and number of violations. (Section K.3.a.3.c., and Attachment D., section D-2., of the test claim permit.) 	
Activity B.4. Annually notice and conduct public meetings to review and update the watershed workplan. (Sections G.6. and K.1.b.4.n.).	\$7,427 - \$10,727
Indirect Costs Identified	\$25,957 - \$37,423
Actual Offsetting Revenue	\$0- \$0
Offsetting Revenue Identified	\$162,922-\$162,992 ⁶
Late Filing Penalty	\$0 - \$22,877
Total Costs	\$351,870 - \$557,715

Assumptions

1. The amount claimed for the period of reimbursement may be higher if late or amended claims are filed. Nine of 13 eligible claimants (69 percent) filed claims for the reimbursement period.⁷ The County and cities Aliso Viejo, Dana Point, and Mission Viejo filed six claims each, Rancho Santa Margarita and San Juan Capistrano filed five claims each, Lake Forest filed four claims, Laguna Niguel filed three claims, and San Clemente filed one claim.

⁶ The County claimed a total of \$403,176 but reduced that by \$162,922, identifying the reduction as offsetting revenue. However, as explained below, the source of the funds used for the reduction are not offsets to the County's costs mandated by the state but rather are the cities' costs provided to the County under their local cost sharing agreement. Therefore, no actual offsetting revenue was identified in any claims and the \$162,922 cannot be claimed by the County as its costs mandated by the state and must be removed from the calculations to ensure reliable final amounts.

⁷ Exhibit X (3), State Controller's Office, Claims Data, CRWQCB, San Diego Region, Order No. R9-2009-0002 Program 382, 10-TC-11.

All nine claimants filed claims for the first fiscal year, 2009-2010, which were primarily composed of costs for the one-time activities. Thus, amended claims for costs for one-time activities are not likely to be filed.

The city of San Clemente adopted a stormwater fee to cover the costs of the activities required by the permit, effective February 7, 2014, through June 30, 2020, and, thus, the City of San Clemente has no costs mandated by the state pursuant to Government Code section 17556(d) during that time period.⁸

No one filed claims for the final two and a half fiscal years of the reimbursement period (2015-2016, 2016-2017, and the first half of 2017-2018). This may be due to the implementation of the next iteration of the permit, R9-2015-0001, which became effective for these permittees on February 11, 2015, and may not have continued to require the ongoing activities. For purposes of this Statewide Cost Estimate, it is presumed that either no reimbursable costs were mandated for the ongoing activities after fiscal year 2014-2015, or that costs of less than \$1,000 were incurred, in which case a reimbursement claim cannot be filed.⁹ Accordingly, there should be no late claims for the final two and a half fiscal years of the reimbursement period (2015-2016, 2016-2017, and the first half of 2017-2018).

The remaining four eligible claimants (the District and the cities of Laguna Beach, Laguna Hills, and Laguna Woods) that have not filed reimbursement claims may still file late claims.

2. The approved reporting requirements in Activities B.1.b., B.3.a., and B.3.b. represent only the higher level of service activities mandated by the state when compared to prior law. Federal law and the prior permit previously required an annual report and several activities claimed were denied on this basis.¹⁰ Therefore, costs to comply with Activities B.1.b., B.3.a., and B.3.b. will be less than the total cost to prepare and submit the annual report.

In addition, no costs were claimed for Activity B.3.a. by the claimants. Activity B.3.a. requires the permittees to notify the Regional Board in the annual report of priority development projects choosing to participate in the Low Impact Development (LID) waiver program. Reimbursement is not required to notify the Regional Board of *municipal* priority development projects choosing to participate in the waiver program, however. It is possible that no priority development projects in the claimants' jurisdictions chose to participate in the waiver program,

⁸ Exhibit A, Test Claim Decision, adopted October 27, 2023, page 329.

⁹ Government Code section 17564.

¹⁰ Exhibit A, Test Claim Decision, adopted October 27, 2023, pages 268-269, 292-297; Code of Federal Regulations, title 40, section 122.42(c).

or the costs for reporting that information were negligible. For the purposes of this Statewide Cost Estimate, it is presumed that the eligible claimants will not file amended or late claims on this Activity.

3. The County, the District, and the cities entered into a stormwater evergreen contract in 2002 which sets forth the following responsibilities: The County provides administrative services including budgeting, reporting, and evaluation of best management practices; the District provides monitoring, enforcement of the county ordinance, and inspections; and the cities submit reports and updated maps to the County. Both the County and the District collect funds from the cities under the contract for these activities.¹¹

The County reduced its total claim of \$403,176 for the period of reimbursement by \$162,922, identifying the reduction as offsetting revenue generated by the payments received by the other copermitees for the reimbursable activities performed by the County under the 2002 contract.¹² However, identifying these funds as offsetting revenues is not correct. Funds received by the County from the other copermitees under an agreement are *not* the County's proceeds of taxes and cannot be claimed by the County as its costs mandated by the state. The test claim permit mandates each copermitee to incur mandated costs and, under the Government Code, the County does not have the authority to claim the costs of other eligible claimants. Except for schools, direct service districts, or special districts whose costs may not reach the minimum \$1,000, the Government Code requires each eligible claimant to file its own reimbursement claim and does not allow one local agency to file a combined claim for the costs incurred by other eligible local agencies.¹³ In addition, it appears from the claims that the City of Aliso Viejo claimed for some of the same costs for fiscal year

¹¹ Exhibit X (2), Excerpt from fiscal year 2009-2010 claim filed by City of Aliso Viejo, pages 22-24.

¹² Exhibit X (1), Claims filed by County of Orange for fiscal years 2009-2010 through 2014-2015, pages 5, 13, 21, 29, 37, 44.

¹³ Government Code section 17564. See also, Government Code section 17561(d)(1)(A), which states that "When claiming instructions are issued by the Controller pursuant to Section 17558 for each mandate determined pursuant to Section 17551 or 17573 that requires state reimbursement, *each* local agency or school district to which the mandate is applicable shall submit claims for initial fiscal year costs to the Controller within 120 days of the issuance date for the claiming instructions." Emphasis added. Government Code section 17560(a) also provides that "*A local agency or school district* may, by February 15 following the fiscal year in which costs are incurred, file an annual reimbursement claim that details the costs actually incurred for that fiscal year." Emphasis added. Thus, each agency is required to submit their own claim for their costs mandated by the state.

2009-2010, which may be part of the revenues reduced by the County.¹⁴ Thus, any share of costs paid by an eligible city to the County as the principal permittee under the contract may be claimed by the city pursuant to Section V. of the Parameters and Guidelines. The city is required to identify and deduct from its claim any portion of those funds that are not the city's proceeds of taxes. Likewise, the County is authorized to claim only for its own costs incurred to comply with the mandated activities, may not claim the cities' costs, and must identify and deduct as offsetting revenues any funds received for its own state-mandated expenses that are not the County's proceeds of taxes.

Therefore, this analysis assumes that the County's net costs mandated by the state total \$240,254 (\$403,176 - \$162,922), that no claimant identified offsetting revenues as described above, and that offsetting revenues will not be claimed in any late or amended claims.

4. Costs may be lower if the Controller audits the claims and determines that other offsetting revenues (i.e., funds that are not the claimant's proceeds of taxes, including grant funds, or fee and assessment revenues) were used by a claimant to pay for the reimbursable activities.
5. Indirect costs are low because overhead is not claimed by most of the cities who are not performing the reimbursable activities themselves but have instead contracted with the County to perform those activities.¹⁵
6. Actual costs may be lower if the Controller reduces any reimbursement claim for this program following an audit deeming the claim to be excessive, unreasonable, or not eligible for reimbursement.

Methodology for Reimbursement Period Cost Estimate

As explained below, the low-end statewide cost estimate represents the costs actually claimed. The high-end statewide cost estimate represents the costs actually claimed plus the costs that could be claimed in late claims.

Activity A.1. consists of developing a monitoring plan to sample a representative percent of the major outfalls within each hydrologic subarea to determine Storm Water Action Level (SAL) compliance.

Activity A.1. actual costs claimed [\$18,454] / the number of filers [9] = average activity A.1. cost per claimant [\$2,050]

Average activity A.1. cost per claimant [\$2,050] x number of non-filers [4] = total estimated non-filer activity A.1. costs [\$8,200]

¹⁴ Exhibit X (2), Excerpt from fiscal year 2009-2010 claim filed by City of Aliso Viejo, pages 5, 9, 11, and 12.

¹⁵ Exhibit X (2), Excerpt from fiscal year 2009-2010 claim filed by City of Aliso Viejo, pages 22-23.

Activity A.1. actual costs claimed [\$18,454] + estimated non-filer activity A.1. costs that could be claimed in late claims [\$8,200] = Total potential activity A.1. costs [\$26,654]

Activity A.2. consists of updating the map of the entire MS4 within each copermitees' jurisdiction in GIS format and submit GIS layers within 365 days of adoption of the permit to the Regional Board.

Activity A.2. actual costs claimed [\$65,621] / the number of filers [9] = average activity A.2. cost per claimant [\$7,291]

Average activity A.2. cost per claimant [\$7,291] x number of non-filers [4] = total estimated non-filer activity A.2. costs [\$29,164]

Activity 2. actual costs claimed [\$65,621] + estimated non-filer activity A.2. costs that could be claimed in late claims [\$29,164] = Total potential activity A.2. costs [\$94,785]

Activity B.1.a. consists of establishing annual assessment measures for reducing discharges into each downstream 303(d) listed water body and downstream environmentally sensitive areas that conform to the six outcome levels developed by CASQA and which target water quality outcomes and the results of municipal enforcement activities, and to annually assess those measures.

Activity B.1.a. actual costs claimed [\$178,620] / the number of filers [9] = average activity B.1.a. cost per claimant [\$19,847]

Average activity B.1.a. cost per claimant [\$19,847] x number of non-filers [4] = total estimated non-filer activity B.1.a. costs [\$79,388]

Activity B.1.a. actual costs claimed [\$178,620] + estimated non-filer activity B.1.a. costs that could be claimed in late claims [\$79,388] = Total potential activity B.1.a. costs [\$258,008]

Activity B.1.b. consists of including effectiveness assessment information within each annual report, beginning with the 2011 annual report.

Activity B.1.b. actual costs claimed [\$45,394] / the number of filers [9] = average activity B.1.b. cost per claimant [\$5,044]

Average activity B.1.b. cost per claimant [\$5,044] x number of non-filers [4] = total estimated non-filer activity B.1.b. costs [\$20,176]

Activity 3.b. actual costs claimed [\$45,394] + estimated non-filer activity B.1.b. costs that could be claimed in late claims [\$20,176] = Total potential activity B.1.b. costs [\$65,570]

Activity B.2. consists of developing, submitting to the Regional Board within 365 days of the adoption of the test claim permit, annually updating and including in the annual JRMP report a work plan to address high priority water quality problems in an iterative manner over the life of the permit.

Activity B.2. actual costs claimed [\$167,152] / the number of filers [9] = average activity B.2. cost per claimant [\$18,572]

Average activity B.2. cost per claimant [\$18,572] x number of non-filers [4] = total estimated non-filer activity B.2. costs [\$74,288]

Activity B.2. actual costs claimed [\$167,152] + estimated non-filer activity B.2. costs that could be claimed in late claims [\$74,288] = Total potential activity B.2. costs [\$241,440]

Activity B.3.a. consists of notifying the Regional Board in the annual report of all other priority development projects choosing to participate in the Low Impact Development (LID) waiver program excluding the permittee's own municipal priority development projects. No claimant claimed these costs and thus, no projection of future costs claimed is possible.

Activity B.3.b. consists of gathering and reporting specified new information in the annual report checklist.

Activity B.3.b. actual costs claimed [\$6,167] / the number of filers [9] = average activity B.3.b. cost per claimant [\$685]

Average activity B.3.b. cost per claimant [\$685] x number of non-filers [4] = total estimated non-filer activity B.3.b. costs [\$2,740]

Activity B.3.b. actual costs claimed [\$6,167] + estimated non-filer activity B.3.b. costs that could be claimed in late claims [\$2,740] = Total potential activity B.3.b. costs [\$8,907]

Activity B.4. consists of annually noticing and conducting public meetings to review and update the watershed workplan.

Activity B.4. actual costs claimed [\$7,427] / the number of filers [9] = average activity B.4. cost per claimant [\$825]

Average activity B.4. cost per claimant [\$825] x number of non-filers [4] = total estimated non-filer activity B.4. costs [\$3,300]

Activity B.4. actual costs claimed [\$7,427] + estimated non-filer activity B.4. costs that could be claimed in late claims [\$3,300] = Total potential activity B.4. costs [\$10,727]

Indirect Costs: The low end of the range for indirect costs is those indirect costs actually claimed. The high end, in addition to indirect costs actually claimed, assumes all eligible claimants who have not yet filed claims will file claims for indirect costs at the same average rate actually claimed, which is calculated by dividing indirect costs claimed by direct costs claimed equals average indirect cost rate (as a percentage). Then multiply the average indirect rate by the estimated direct costs.

Indirect Costs Actually Claimed [\$25,957] / Direct Costs Actually Claimed [\$488,836] = Average Indirect Cost Rate [5.3%].

Indirect Cost Rate [5.3%] x Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [\$706,092] = High End of the Estimated Indirect Costs [\$37,423].

Offsetting Revenues: The low end of the range is total offsetting revenues actually identified, which as stated above is \$0. Since there are no offsetting revenues properly identified, projections cannot be made. Thus, the high end remains the same as the low end of the range; both at \$0 offsetting revenues.

Late Filing Penalties: The low end is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high end assumes all eligible claimants who have not yet filed claims will file for the initial period of reimbursement, subject to a late filing penalty. Late fees are therefore calculated by adding non-filer direct and indirect costs and subtracting offsets to get net costs and then multiplying the net costs by a ten percent penalty rate to estimate the high-end late filing penalties.

Estimated Non-filer Direct and Indirect Costs [\$228,770] – Estimated Non-filer Offsets [\$0] = Estimated Non-filer Net Costs [\$228,770].

Estimated Non-filer Net Costs [\$228,770] x (10% late filing penalty) = Estimated Non-filer Late Filing Penalties [\$22,877].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties [\$22,877] = High End of Estimated Late Filing Penalties [\$22,877].

Draft Proposed Statewide Cost Estimate

On November 27, 2024, Commission staff issued the Draft Proposed Statewide Cost Estimate.¹⁶

Staff Recommendation

Staff recommends the Commission adopt this Statewide Cost Estimate of \$351,870 to \$557,715 for the Initial Claim Period from December 16, 2009 through December 31, 2017.

¹⁶ Exhibit C, Draft Proposed Statewide Cost Estimate, issued November 27, 2024.

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 27, 2024, I served the:

- **Current Mailing List dated November 21, 2024**
- **Draft Proposed Statewide Cost Estimate, Schedule for Comments, and Notice of Hearing issued November 21, 2024**

*California Regional Water Quality Control Board, San Diego Region,
Order No. R9-2009-0002, Sections D.2.; F.1.d.7.i.; F.4.b.; G.6.; K.1.b.4.n.;
K.3.a.3.c.; J.1.; J.3.; J.4.; and Attachment D, Section D-2,
Adopted December 16, 2009, 10-TC-11*

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 27, 2024 at Sacramento, California.



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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 11/21/24

Claim Number: 10-TC-11

Matter: California Regional Water Quality Control Board, San Diego Region, Order No. R9-2009-0002, Sections B.2.; C.; D.; F.1.d.; F.1.d.7.i.; F.1.f.; F.1.h.; F.3.a.4.c.; F.3.d.; F.4.b.; F.4.d.; F.4.e.; G.6.; I.; J.; K.1.b.4.n.; and, Only as They Relate to the Reporting Checklist, Section K.3.a. and Attachment D, Adopted December 16, 2009

Claimants: City of Dana Point
City of Laguna Hills
City of Laguna Niguel
City of Lake Forest
City of Mission Viejo
City of San Juan Capistrano
County of Orange
Orange County Flood Control District

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

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

Adaoha Agu, *County of San Diego Auditor & Controller Department*

Projects, Revenue and Grants Accounting, 5530 Overland Avenue, Ste. 410 , MS:O-53, San Diego, CA 92123

Phone: (858) 694-2129

Adaoha.Agu@sdcounty.ca.gov

Rachelle Anema, *Division Chief, County of Los Angeles*

Accounting Division, 500 W. Temple Street, Los Angeles, CA 90012

Phone: (213) 974-8321

RANEMA@auditor.lacounty.gov

Lili Apgar, *Specialist, State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 324-0254

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

Harmeet Barkschat, *Mandate Resource Services, LLC*
5325 Elkhorn Blvd. #307, Sacramento, CA 95842
Phone: (916) 727-1350
harmeet@comcast.net

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

Ginni Bella Navarre, Deputy Legislative Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8342
Ginni.Bella@lao.ca.gov

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

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

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

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

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

Carolyn Chu, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8326
Carolyn.Chu@lao.ca.gov

Michael Coleman, *Coleman Advisory Services*
2217 Isle Royale Lane, Davis, CA 95616
Phone: (530) 758-3952
coleman@muni1.com

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

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

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

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

James Eggart, *Woodruff, Spradlin & Smart*
555 Anton Boulevard, #1200, Costa Mesa, CA 92626-7670
Phone: (714) 415-1062
JEggart@wss-law.com

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

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

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

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, Executive Director, *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@bbkllaw.com

Andrew Hamilton, Auditor-Controller, *County of Orange*
Claimant Contact
1770 North Broadway, Santa Ana, CA 92706
Phone: (714) 834-2450
Andrew.Hamilton@ac.ocgov.com

Jarad Hildenbrand, City Manager, *City of Laguna Hills*
Claimant Contact
24035 El Toro Road, Laguna Hills, CA 92653
Phone: (949) 707-2611
jhildenbrand@lagunahillsca.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

Jeremy Hohnbaum, Senior Civil Engineer, *City of San Juan Capistrano*
Public Works, 32400 Paseo Adelanto, San Juan Capistrano, CA 92675
Phone: (949) 449-1190
JHohnbaum@sanjuancapistrano.org

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

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

Anne Kato, Acting Chief, *State Controller's Office*
Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA
95816
Phone: (916) 322-9891
akato@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

Mike Killebrew, City Manager, *City of Dana Point*
Claimant Contact
33282 Golden Lantern, Dana Point, CA 92629-1805
Phone: (949) 248-3554
mkillebrew@danapoint.org

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

Anya Kwan, *Best Best & Krieger LLP*
300 South Grand Ave., 25th Floor, Los Angeles, CA 90071
Phone: (213) 542-3867
Anya.Kwan@bbkllaw.com

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

Tamara Letourneau, City Manager, *City of Laguna Niguel*
Claimant Contact
30111 Crown Valley Parkway, Laguna Niguel, CA 92677
Phone: (949) 362-4300
tletourneau@cityoflagunaniguel.org

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

Hazel McIntosh, Associate Engineer, *City of Mission Viejo*
200 Civic Center, Mission Viejo, CA 92691
Phone: (949) 470-8419
hmcintosh@cityofmissionviejo.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

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

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

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

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

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

Kevin Onuma, Chief Engineer, *Orange County Flood Control District*
Claimant Contact
601 N. Ross Street, Santa Ana, CA 92701
Phone: (714) 647-3939
kevin.onuma@ocpw.ocgov.com

Eric Oppenheimer, Executive Director, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5615
eric.oppenheimer@waterboards.ca.gov

Patricia Pacot, Accountant Auditor I, *County of Colusa*
Office of Auditor-Controller, 546 Jay Street, Suite #202 , Colusa, CA 95932
Phone: (530) 458-0424
ppacot@countyofcolusa.org

Arthur Palkowitz, *Law Offices of Arthur M. Palkowitz*
12807 Calle de la Siena, San Diego, CA 92130
Phone: (858) 259-1055
law@artpalk.onmicrosoft.com

Kirsten Pangilinan, Specialist, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 322-2446
KPangilinan@sco.ca.gov

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

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

Jonathan Quan, Associate Accountant, *County of San Diego*
Projects, Revenue, and Grants Accounting, 5530 Overland Ave, Suite 410, San Diego, CA 92123
Phone: 6198768518
Jonathan.Quan@sdcountry.ca.gov

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

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

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

Omar Sandoval, *Woodruff, Spradlin & Smart*
555 Anton Boulevard, #1200, Costa Mesa, CA 92626
Phone: (714) 415-1049
osandoval@wss-law.com

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

Richard Schlesinger, *City of Mission Viejo*
200 Civic Center, Mission Viejo, CA 92691
Phone: (949) 470-3079
rschlesinger@cityofmissionviejo.org

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

Jacki Scott, Director of Public Works, *City of Laguna Niguel*
30111 Crown Valley Parkway, Laguna Niguel, CA 92677
Phone: (949) 362-4337
jscott@cityoflagunaniguel.org

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

Ben Siegel, City Manager, *City of San Juan Capistrano*
Claimant Contact
32400 Paseo Adelanto, San Juan Capistrano, CA 92675
Phone: (949) 493-1171
bsiegel@sanjuancapistrano.org

Luther Snoke, Chief Executive Officer, *County of San Bernardino*
San Bernardino County Flood Control District, 385 North Arrowhead Avenue, Fifth Floor, San Bernardino, CA 92415
Phone: (909) 387-5417
lsnoke@cao.sbcounty.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

James Treadaway, Director of Public Works, *County of Orange*
300 North Flower Street, Santa Ana, CA 92703

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

Brian Uhler, Principal Fiscal & Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8328
Brian.Uhler@LAO.CA.GOV

Travis Van Ligten, Associate, *Rutan & Tucker, LLP*
611 Anton Blvd, Suite 1400, Costa Mesa, CA 92626
Phone: (714) 641-5100
tvanligten@rutan.com

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

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

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

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

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

Dennis Wilberg, City Manager, *City of Mission Viejo*
Claimant Contact
200 Civic Center, Mission Viejo, CA 92691
Phone: (949) 470-3051
dwilberg@cityofmissionviejo.org

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

Yuri Won, Attorney, Office of Chief Counsel, *State Water Resources Control Board*
San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 327-4439
Yuri.Won@waterboards.ca.gov

Jacqueline Wong-Hernandez, Deputy Executive Director for Legislative Affairs, *California State Association of Counties (CSAC)*

1100 K Street, Sacramento, CA 95814
Phone: (916) 650-8104
jwong-hernandez@counties.org

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

Elisa Wynne, Staff Director, *Senate Budget & Fiscal Review Committee*
California State Senate, State Capitol Room 5019, Sacramento, CA 95814
Phone: (916) 651-4103
elisa.wynne@sen.ca.gov

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

Lisa Zawaski, Senior Water Quality Engineer, *City of Dana Point*
Dana Point City Hall, 33282 Golden Lantern Street, Public Works Suite 212, Dana Point, CA 92629
Phone: (949) 248-3584
lzawaski@danapoint.org

Helmholt Zinser-Watkins, Associate Governmental Program Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 700,
Sacramento, CA 95816
Phone: (916) 324-7876
HZinser-watkins@sco.ca.gov