



January 29, 2025

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)

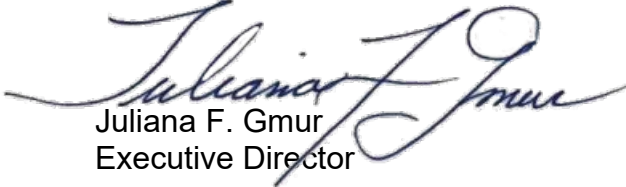
Re: Statewide Cost Estimate

*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:

On January 24, 2025, the Commission on State Mandates adopted the Statewide Cost Estimate on the above-entitled matter.

Very truly yours,


Juliana F. Gmur
Executive Director

Adopted: January 24, 2025

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 on consent by a vote of 7-0 during a regularly scheduled hearing on January 24, 2025 as follows:

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

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

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).

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 copermittees 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 copermittees' 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 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.)

² Exhibit B, Corrected Decision and Parameters and Guidelines, page 10.

³ Exhibit B, Corrected Decision and Parameters and Guidelines, page 10.

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

- 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 copermittees 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

⁵ Exhibit B, Corrected Decision and Parameters and Guidelines, pages 13-14.

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 copermittees' 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	
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.)	\$178,620 - \$258,008
Activity B.1.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	\$45,394 - \$65,570

<p>stormwater pollutants from the MS4 into each 303(d) listed waterbody. (Section J.3.a.1.)</p> <ul style="list-style-type: none"> • 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>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. • 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>\$167,152 - \$241,440</p>
<p>Activity B.3.a. Except for the permittee's own municipal priority development projects, notify the Regional Board in</p>	<p>\$0 - \$0</p>

<p>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>	
<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 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.) 	<p>\$6,167 - \$8,907</p>
<p>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.).</p>	<p>\$7,427 - \$10,727</p>
<p>Indirect Costs Identified</p>	<p>\$25,957 - \$37,423</p>

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.

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

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

⁸ Exhibit A, Test Claim Decision, page 329.

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, 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

⁹ Government Code section 17564.

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

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

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 copermittees 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 copermittee 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 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.

¹² Exhibit D (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.

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

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 Levels (SALs) 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]

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 copermitttees' 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]

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

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 B.1.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 No comments were filed on the Draft Proposed Statewide Cost Estimate.

Conclusion

On January 24, 2025, the Commission adopted 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.

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.

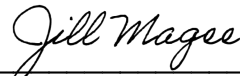
On January 29, 2025, I served the:

- **Current Mailing List dated January 23, 2025**
- **Statewide Cost Estimate adopted January 24, 2025**

*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 January 29, 2025 at Sacramento, California.



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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 1/23/25

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.)

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