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March 13, 2025

RECEIVED
March 13, 2025
**Commission on
State Mandates**

Juliana F. Gmur
Executive Director
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980 9th Street, Suite #300
Sacramento, CA 95814

Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2
On Remand from *City of San Diego v. Commission on State Mandates*, Sacramento County
Superior Court, Case No. 24WM000056; Permit Amendment No. 2017PA-SCHOOLS, City of
San Diego Public Water System No. 3710020, effective January 18, 2017
City of San Diego, Claimant
Comments on Proposed Decision

Dear Ms. Gmur:

Please accept these comments on behalf of Claimant City of San Diego (City) in response to the Proposed Decision issued on February 26, 2025. The City agrees with the Proposed Decision, but requests one modification on the Commission's finding regarding California Constitution article XIII D, section 6(b)(4).

Per previous Court rulings, given that the Permit Amendment imposes a new program or higher level of service, and the City was practically compelled to comply, the only remaining issue is whether the City has fee authority to recoup the costs under Government Code section 17556(d).

The City agrees Proposition 218 (Cal. Const, article XIII D, section 6(b)) prevents the City from charging a fee or charge to recoup the costs. Though the City agrees with the Commission's ultimate outcome, the City maintains that *Richmond v. Shasta Community Services Dist.* (2004) 32 Cal.4th 409 and *Apartment Assn. of Los Angeles County, Inc. v. City of Los Angeles* (2001) 24 Cal.4th 83 apply; lead testing is not a property related service because it is triggered by the schools' voluntary decision to request testing. Therefore, the City cannot charge all owners to recoup the costs. Regardless, even assuming *Richmond* and *Apartment Assn.* do not apply, the Commission correctly finds that proportionality still prevents the City from recouping costs. Proposed Decision, pp. 75-78.

The City requests correction of the Commission's finding that "the service provided under the test claim order benefits all water users connected to the water system" and, therefore, satisfies article XIII D, section 6(b)(4). Proposed Decision, p. 75. The Commission misreads the City's

declaration by Doug Campbell in stating, “the claimant’s declarant states that in all instances where remediation was performed at the schools that had lead exceedances, follow-up sampling showed the source of the lead was removed and no problems to the city’s water system were identified.” Proposed Decision, pp. 75-76.

Mr. Campbell *did not* state that lead testing at schools resulted in removing lead from the City’s water; he stated the opposite:

All remediations conducted by the schools consisted of replacement of fixtures or drinking fountains, or replacement of plumbing lines internal to the schools themselves. In all instances where remediation was performed, follow-up sampling has shown that the source of lead was removed. **The City has not identified any problems with City water through the Permit Amendment.**

Supplemental Declaration of Doug Campbell, ¶ 10 (Exhibit 5 of the City’s Comments on the Commission’s December 21, 2018 Draft Proposed Decision; enclosed here as Exhibit A) [emphasis added].

In other words, the schools’ fixtures, drinking fountains, and plumbing caused lead to enter the schools’ water *alone*. Therefore, replacing those fixtures, drinking fountains, and plumbing only fixed the schools’ lead issue. Accordingly, given that only the schools benefited from the lead testing, article XIII D, section 6(b)(4) is not satisfied.

Lastly, the City agrees with the Commission’s findings that none of the Proposition 26 exceptions apply. The City respectfully requests that the Commission adopt the Proposed Decision with the modification outlined above.

Sincerely yours,

HEATHER FERBERT, City Attorney

By



Kevin B. King
Deputy City Attorney

EXHIBIT A

SECTION 6. DECLARATIONS

Test Claim Title: SWRCB Water Supply Permit Amendment (2017PA-SCHOOLS) for PWS No. 3710020

Claimant: City of San Diego

**SUPPLEMENTAL DECLARATION OF DOUG CAMPBELL
IN SUPPORT OF TEST CLAIM FILED BY THE CITY OF SAN DIEGO**

I, Doug Campbell, declare as follows:

1. I am a Senior Chemist of the Public Utilities Department (PUD) that oversees the Department's Water Quality Chemistry Services section for the City of San Diego (City). In that capacity, I have direct oversight of the City's implementation of monitoring requirements contained in the City's Domestic Water Supply Permit (the Permit) and in the Permit Amendment No. 2017PA-SCHOOLS (Permit Amendment), as adopted by the California State Water Resources Control Board (SWRCB).

2. I instructed and supervised each of the staff members who were required to perform this work as stated in the Test Claim Documents and this Declaration, and have personal knowledge of the work that was required by each of them at my direction.

3. I have reviewed sections of the Test Claim filing as set forth herein and am familiar with those provisions. I am also familiar with the pertinent sections of Permit Amendment No. 2017PA-SCHOOLS, which was issued by the SWRCB on January 17, 2017.

5. I have personal knowledge of the activities required to comply with the Permit and the Permit Amendment.

6. I have personal knowledge of the facts contained in this declaration, and if called upon as a witness, I could and would competently testify to the truthfulness of these facts as set forth in this declaration.

7. The City is on a reduced monitoring program approved by the SWRCB and is only required to test 50 residences every three years under the federal and state lead and copper rules, as the City's past test results have not exceeded action levels at the 90th percentile.

SECTION 6. DECLARATIONS

**Test Claim Title: SWRCB Water Supply Permit Amendment (2017PA-SCHOOLS) for
PWS No. 3710020**

Claimant: City of San Diego

**SUPPLEMENTAL DECLARATION OF DOUG CAMPBELL
IN SUPPORT OF TEST CLAIM FILED BY THE CITY OF SAN DIEGO**

8. The City tested 262 schools from the date of the Permit Amendment until January 7, 2019. Elevated lead levels with values greater than 15 ppb were discovered in five fixtures on four school sites.

9. Three of the four school sites took remedial action to replace the fixtures. When the City retested after the schools took remedial action, lead levels were Not Detected or below the 15-ppb action level. One school did not perform any remediation, as it is no longer located in the facility.

10. All remediations conducted by the schools consisted of replacement of fixtures or drinking fountains, or replacement of plumbing lines internal to the schools themselves. In all instances where remediation was performed, follow-up sampling has shown that the source of lead was removed. The City has not identified any problems with City water through the Permit Amendment.

11. There are multiple campus sites where two schools are co-located (as identified in the state database). Because each school is eligible for lead testing, these schools were treated separately and each school was sampled individually, even though both schools are located on the same property.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed this 9th day of January 2019 in San Diego, California.



Doug Campbell, Senior Chemist
Public Utilities Department

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 March 14, 2025, I served the:

- **Current Mailing List dated March 11, 2025**
- **Claimant's Comments on the Proposed Decision filed March 13, 2025**

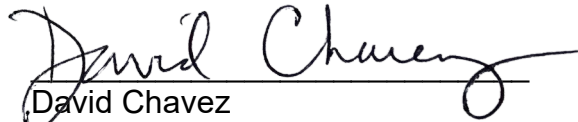
Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2

On Remand from City of San Diego v. Commission on State Mandates,
Sacramento County Superior Court, Case No. 24WM000056; Permit Amendment
No. 2017PA-SCHOOLS, City of San Diego Public Water System No. 3710020,
effective January 18, 2017

City of San Diego, Claimant

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 March 14, 2025 at Sacramento, California.



David Chavez
Commission on State Mandates
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(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 3/11/25

**Claim
Number:** 17-TC-03-R2

Matter: Lead Sampling in Schools: Public Water System No. 3710020

Claimant: City of San Diego

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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