



September 18, 2026

Juliana Gmur
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
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Comments on the draft proposed decision

California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2022-0018, 22-TC-07, as modified by Order No. R2-2023-0019; NPDES Permit No. CAS612008; Provisions C.3.b.i., C.3.b.ii.4., C.3.b.ii.5., C.3.j.ii.1.a.-g., C.3.j.ii.2.a.-j., C.3.j.ii.4., C.5.f., C.8.d., C.8.e., C.8.f., C.10.a.i., C.10.a.ii., C.10.e., C.11.c., C.12.a., C.12.c., C.15.b.iii., C.17.a., C.20.b., C.21.b., Issued May 11, 2022, Effective July 1, 2022 Union City, Claimant

Dear Director Gmur,

The Department of Finance (Finance) has completed its review of the proposed decision by the Commission on State Mandates (Commission) for the above referenced Test Claim. Finance appreciates the careful consideration and effort by staff and agree with the conclusion that the test claim permit does not impose a reimbursable state-mandated program within the meaning of article XIII B, section 6 of the California Constitution.

Further, Finance concurs with and joins in comments submitted by the State Water Resources Control Board and California Regional Water Quality Control Board, San Francisco Bay Region (San Francisco Bay Water Board) (together, Water Boards) on the proposed decision.

If you have any questions regarding this letter, please contact Jiwon Jeong, Staff Counsel at (916) 639-3135.

Sincerely,



Jiwon Jeong
Staff Counsel

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.

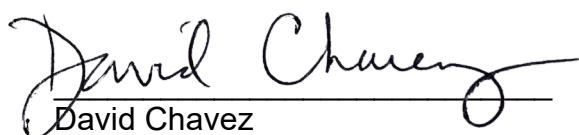
On September 18, 2026, I served the:

- **Current Mailing List dated September 14, 2026**
- **Finance's Comments on the Draft Proposed Decision filed September 18, 2026**
- **Water Boards' Comments on the Draft Proposed Decision filed September 18, 2026**

*California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2022-0018, 22-TC-07, as modified by Order No. R2-2023-0019;
NPDES Permit No. CAS612008; Provisions C.3.b.i., C.3.b.ii.4., C.3.b.ii.5.,
C.3.j.ii.1.a.-g., C.3.j.ii.2.a.-j., C.3.j.ii.4., C.5.f., C.8.d., C.8.e., C.8.f., C.10.a.i.,
C.10.a.ii., C.10.e., C.11.c., C.12.a., C.12.c., C.15.b.iii., C.17.a., C.20.b., C.21.b.,
Issued May 11, 2022, Effective July 1, 2022
Union City, 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 September 18, 2026 at Sacramento, California.



David Chavez
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 9/14/26

Claim Number: 22-TC-07

Matter: California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2022-0018

Claimant: Union City

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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