



## State Water Resources Control Board

August 25, 2023

**RECEIVED**  
August 25, 2023  
**Commission on  
State Mandates**

### VIA DROP BOX

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

### COMMENTS ON DRAFT PROPOSED DECISION FOR TEST CLAIM 10-TC-11

*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, 10-TC-11*  
Cities of Dana Point, Laguna Hills, Laguna Niguel, Lake Forest, Mission Viejo, San Juan Capistrano, the County of Orange, and the Orange County Flood Control District, Claimants

Dear Ms. Halsey:

The State Water Resources Control Board (State Water Board) and the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) (collectively Water Boards) provide the following comments on the Draft Proposed Decision in the above-referenced test claim. The Water Boards appreciate the careful and thoughtful work of the Commission on State Mandates (Commission) staff and concur with the recommendation to deny the Test Claim in its entirety as to the challenged provisions in San Diego Water Board Order No. R9-2009-0002 (test claim permit).

As a preliminary matter, the Water Boards note that after claimants filed their initial test claim on June 30, 2011, the Commission staff issued a Notice of Incomplete Joint Test Claim Filing on November 18, 2016, identifying, among other items, that the original test claim was “missing a detailed description of increased costs and a statewide estimate of costs as required by Government Code section 17553.” (Notice of Incomplete Joint Test Claim Filing, p. 2.) Claimants submitted rebuttal comments and their response to the Notice of Incomplete Joint Test Claim Filing on January 6, 2017. The Water Boards agree with the Commission staff’s assessment that no reimbursement is required as the record lacks substantial evidence of increased costs mandated by the state and

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

claimants have not demonstrated they have been forced to use tax proceeds for the activities the Draft Proposed Decision concludes are mandated by the state.<sup>1</sup> Claimants have already had two opportunities to submit detailed cost information as required by Government Code section 17553, subdivision (b), first as part of their initial test claim and second in response to the Notice of Incomplete Joint Test Claim Filing. Claimants should not be permitted to now have a third opportunity at this late date to submit new cost information. If Claimants submit new cost information in response to the Draft Proposed Decision and the Commission accepts such information, the Water Boards request an opportunity to review the information and submit a written response.

*Claimants have fee authority for the entire test claim period*

The Draft Proposed Decision contains extensive discussion of local agency constitutional and statutory authorities to raise fees, including discussion of what has been found to constitute sufficient fee authority as a legal matter within the meaning of Government Code section 17556, subdivision (d).<sup>2</sup> The Water Boards agree with the Draft Proposed Decision's conclusion that to the extent the Commission finds state mandated requirements, there are no costs mandated by the state for costs incurred beginning January 1, 2018.<sup>3</sup>

As explained below, the Water Boards disagree with the Draft Proposed Decision's conclusion that claimants lack fee authority for costs incurred *prior* to 2018 due to Proposition 218's voter approval provisions. California courts have consistently held that fee authority is purely a question of legal authorization. (*Connell v. Superior Court* (1997) 59, Cal.App.4th 382, 401 [holding that the focus under Government Code section 17556 is whether a local agency has "authority, i.e., the right or power, to levy fees sufficient to cover the costs:]; *Clovis Unified School Dist. v. Chiang* (2010) 188 Cal.App.4th 794, 812.) "[F]actual considerations of practicality" do not defeat a local agency's fee authority. (*Paradise Irrigation Dist. v. Commission on State Mandates* (2019) 33 Cal.App.5th 174, 195.) The Draft Proposed Decision correctly finds that claimants have authority under their police powers to impose fees in connection with challenged permit provisions. Even where Proposition 218 super-imposes a voter approval provision on fees to pay for specific state mandates, the Commission should find claimants' authority nonetheless exists and expenditures for mandates are not reimbursable.

In *Paradise Irrigation, supra*, the court of appeal considered whether the majority protest procedure added by Proposition 218 deprived local agencies of authority to impose fees for water service. (33 Cal.App.5th at p. 182.) California Constitution, Article XIII D, section 6(a), requires a local agency to identify parcels subject to a new fee, calculate the fee amount, and provide notice to affected property owners. (Art. XIII D, § 6, subd.

---

<sup>1</sup> See Draft Proposed Decision, pp. 333-341.

<sup>2</sup> See Draft Proposed Decision, pp. 341-378.

<sup>3</sup> Since the test claim permit was superseded by another permit beginning April 1, 2015, ([Order No. R9-2015-0001 \(ca.gov\)](#) p. 8), the Draft Proposed Decision should be revised to recognize that the scope of any period of reimbursement ends March 31, 2015.

(a)(1).) If a majority of property owners submits written protests against the fee, the fee may not be imposed. (*Id.*, subd. (a)(2).)

The *Paradise Irrigation* court held that the “majority protest procedures are properly construed as a power-sharing arrangement between the districts and their customers, rather than a deprivation of fee authority.” (33 Cal.App.5th at p. 182.) It explained that, when considering how voter powers affect the ability of local governments to impose fees, courts “presume local voters will give appropriate consideration and deference to state mandated requirements . . . .” (*Id.*, at p. 194, citing *Bighorn-Desert View Water Agency v. Verjil* (2006) 39 Cal.4th 205, 220.) “Although this power-sharing arrangement has the potential for conflict, we must presume that both sides will act reasonably and in good faith.” (*Id.*, at p. 192.) Further, the fact that, “as a matter of practical reality, the majority protest procedure allows water customers to defeat the District’s authority to levy fees” was not dispositive; “the inquiry into fee authority constitutes an issue of law rather than a question of fact.” (*Id.*, at p. 195, citing *Connell, supra*, 59 Cal.App.4th at p. 401.)

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

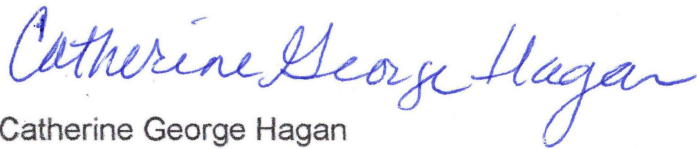
Under Proposition 218, local property owners share the power to impose certain fees with their governing bodies. This more direct governance process does not deprive a local agency of any fee authority, the local agency simply shares that authority with affected property owners or voters. Such property owners or voters are considered part of the legislating body, a body that has legal fee authority required by Government Code section 17556. Whether a fee is subject to voter approval (which may be withheld) or majority protest (which can defeat a fee), there is the same potential practical result that the local agency will be unable to collect the desired fee. Since the same potential outcome can result from either power-sharing mechanism, there is no compelling reason to find fee authority exists in one mechanism but not the other. While voter approval provisions, like voter protest provisions, may complicate the exercise of fee authority, they do not negate it.

Therefore, while the Water Boards agree with the Draft Proposed Decision’s reasoning to deny the test claim, the Commission should find that to the extent there are any state mandated costs, claimants have necessary fee authority and are entitled to no reimbursement.

For the above reasons, the Water Boards request the Commission adopt the Draft Proposed Decision with the limited changes requested by the Water Boards.

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

Sincerely,



Catherine George Hagan  
Attorney IV  
Office of Chief Counsel  
State Water Resources Control Board  
Tel. 619.521.3012

## 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 August 28, 2023, I served the:

- **Current Mailing List dated August 24, 2023**
- **Claimants' Comments on the Draft Proposed Decision filed August 25, 2023**
- **Finance's Comments on the Draft Proposed Decision filed August 25, 2023**
- **Water Boards' Comments on the Draft Proposed Decision filed August 25, 2023**

*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,<sup>1</sup> Adopted December 16, 2009, 10-TC-11*

Cities of Dana Point, Laguna Hills, Laguna Niguel, Lake Forest, Mission Viejo, San Juan Capistrano, the County of Orange, and the Orange County Flood Control District, Claimants

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on August 28, 2023 at Sacramento, California.

*David Chavez*

\_\_\_\_\_  
David Chavez  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, CA 95814  
(916) 323-3562

---

<sup>1</sup> Government Code section 17553(b)(1) requires test claims to identify the specific sections of the executive order alleged to contain a mandate and a detailed description of the new activities mandated by the state. Only the sections indicated in this caption, and Section K.3.a. and Attachment D only as they relate to the reporting checklist, have been properly pled.

# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 8/24/23

**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](mailto:Adaoha.Agu@sdcounty.ca.gov)

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

**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

**Cindy Black**, City Clerk, *City of St. Helena*  
1480 Main Street, St. Helena, CA 94574  
Phone: (707) 968-2742  
ctzafopoulos@cityofsthelena.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

**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  
achinnrcs@aol.com

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

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

**Kris Cook**, Assistant Program Budget Manager, *Department of Finance*  
915 L Street, 10th Floor, Sacramento, CA 95814  
Phone: (916) 445-3274  
Kris.Cook@dof.ca.gov



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

**Brian Cote**, Senior Government Finance & Administration Analyst, *California State Association of Counties (CSAC)*  
1100 K Street, Suite 101, Sacramento, CA 95814  
Phone: (916) 650-8184  
bcote@counties.org

**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@sdcountry.ca.gov

**Kalyn Dean**, 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  
kdean@counties.org

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

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

**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

**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@bbklaw.com

**Heather Halsey**, Executive Director, *Commission on State Mandates*

980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
heather.halsey@csm.ca.gov

**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

**Sunny Han**, Acting Chief Financial Officer, *City of Huntington Beach*

2000 Main Street, Huntington Beach, CA 92648

Phone: (714) 536-5630

Sunny.Han@surfcity-hb.org

**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, 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

**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

**Michael Lauffer, Chief Counsel, State Water Resources Control Board**

1001 I Street, 22nd Floor, Sacramento, CA 95814-2828

Phone: (916) 341-5183

michael.lauffer@waterboards.ca.gov

**Kim-Anh Le, Deputy Controller, County of San Mateo**

555 County Center, 4th Floor, Redwood City, CA 94063

Phone: (650) 599-1104

kle@smcgov.org

**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

**Jane McPherson**, Financial Services Director, *City of Oceanside*  
300 North Coast Highway, Oceanside, CA 92054  
Phone: (760) 435-3055  
JmcPherson@oceansideca.org

**Michelle Mendoza**, *MAXIMUS*  
17310 Red Hill Avenue, Suite 340, Irvine, CA 95403  
Phone: (949) 440-0845  
michellemendoza@maximus.com

**Andre Monette**, Partner, *Best Best & Krieger, LLP*  
2000 Pennsylvania NW, Suite 5300, Washington, DC 20006

Phone: (202) 785-0600  
andre.monette@bbklaw.com

**Lourdes Morales**, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*

925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8320  
Lourdes.Morales@LAO.CA.GOV

**Marilyn Munoz**, Senior Staff Counsel, *Department of Finance*

915 L Street, Sacramento, CA 95814  
Phone: (916) 445-8918  
Marilyn.Munoz@dof.ca.gov

**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

**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@sdcounty.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

**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, *MGT*  
Performance Solutions Group, 3600 American River Drive, Suite 150,  
Sacramento, CA 95864  
Phone: (916) 276-8807  
csconce@mgtconsulting.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**, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
carla.shelton@csm.ca.gov

**Natalie Sidarous**, Chief, *State Controller's Office*  
Local Government Programs and Services Division, 3301 C Street, Suite 740,  
Sacramento, CA 95816  
Phone: 916-445-8717  
NSidarous@sco.ca.gov

**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

**Michelle Skaggs Lawrence**, City Manager, *City of Oceanside*  
300 North Coast Highway, Oceanside, CA 92054  
Phone: (760) 435-3055  
citymanager@oceansideca.org



**Eileen Sobeck**, Executive Director, *State Water Resources Control Board*  
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828  
Phone: (916) 341-5183  
Eileen.Sobeck@waterboards.ca.gov

**Jolene Tollenaar**, *MGT Consulting Group*  
2251 Harvard Street, Suite 134, Sacramento, CA 95815  
Phone: (916) 243-8913  
jolenetollenaar@gmail.com

**James Treadaway**, Director of Public Works, *County of Orange*  
300 North Flower Street, Santa Ana, CA 92703  
Phone: (714) 667-9700  
James.Treadaway@ocpw.ocgov.com

**Evelyn Tseng**, *City of Newport Beach*  
100 Civic Center Drive, Newport Beach, CA 92660  
Phone: (949) 644-3127  
etseng@newportbeachca.gov

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

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

**Antonio Velasco**, Revenue Auditor, *City of Newport Beach*  
100 Civic Center Drive, Newport Beach, CA 92660  
Phone: (949) 644-3143  
avelasco@newportbeachca.gov

**Vincent Vu**, Attorney, *State Water Resources Control Board*  
San Diego Regional Water Quality Control Board, 1001 I Street, 22nd Floor,  
Sacramento, CA 95814  
Phone: (916) 323-5669  
Vincent.Vu@waterboards.ca.gov

**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

**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

**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

**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