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November 7, 2014

Heather Halsey, Executive Director
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Re: Response to DWR Comments on Draft Proposed Decision Re: Test Claim No. 10-TC-12 (Water Conservation), consolidated with Test Claim No. 12 TC 01 (Agricultural Water Measurement)

Dear Ms. Halsey:

This letter is in reply to comments of the Department of Water Resources (DWR), filed on October 17, 2014, which raise issues not addressed in the Draft Proposed Decision issued on July 31, 2014. In its comment letter, DWR urges the Commission on State Mandates (Commission) to deny subvention to the Claimants in consolidated Test Claims 10-TC-12 and 12-TC-01 based on a finding that the test claim statutes and regulations at issue do not constitute a "program" as that term is used in article XIII B, section 6, of the California Constitution (Section 6).[1] DWR contends that if the laws and regulations at issue in the consolidated test claims are not "programs," then the Claimants are not eligible for subvention.

The word "program," as used in Section 6, has two alternative definitions: (1) "programs that carry out the governmental function of providing services to the public" and (2) "laws which, to implement a state policy, impose unique requirements on local governments and do not apply generally to all residents and entities in the state."[2] Activities mandated by a "program" that falls within either of these two meanings may be eligible for reimbursement.[3] Both definitions apply in these Test Claims.

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1 "Whenever the Legislature or any state agency mandates a new program or higher level of service on any local government, the State shall provide a subvention of funds to reimburse that local government for the costs of the program or increased level of service . . . ." Cal. Const., art. XIII b, § 6(a).

2 *County of Los Angeles v. State of California* (1987) 43 Cal.3d 46, at p. 56.

3 *Carmel Valley Fire Protection Dist. v. State of California* (1987) 190 Cal.App.3d 521, at p. 537.

In its comments, DWR argues that the first definition does not apply because it claims that, in order to be a "program," the "service" provided to the public must be an "*exclusively* governmental function," and DWR claims that water service is not an exclusively governmental function. DWR also contends that the second definition of "program" does not apply because the laws and regulations at issue in the test claim apply to private and public entities alike, and therefore do not impose "unique requirements on local governments," but rather "apply generally to all residents and entities in the state." DWR's arguments are flawed for the reasons explained below.

I. The Statutes and Regulations at Issue in this Test Claim Constitute "Programs that Carry Out the Governmental Function of Providing Services to the Public."

DWR argues that the test claim statutes and regulations are not a "program" eligible for reimbursement because the provision of water service is not a "uniquely" or "exclusively" governmental function.[4] However, nothing in the definition of "program" requires the service provided to the public to be uniquely or exclusively "governmental."[5] Instead, it only requires that the program relate to a service that is provided as a function of government.[6]

Here, the Claimants are all governmental entities organized for the specific statutory purpose of providing water to the public.[7] The California Water Code provides enabling legislation for many types of governmental entities whose main purpose is to perform the governmental function of providing water service to the public.[8] Contrary to DWR's assertions, these agencies' functions are recognized by the courts as being governmental functions.[9] As a result, there can be no doubt that the Claimants and all other affected governmental entities are "carry[ing] out the governmental function of providing [water] service[] to the public" when implementing the mandated actions at issue in the consolidated test claims.

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4 DWR Letter at pp. 5, 7.

5 See *County of Los Angeles, supra*, 43 Cal.3d at p. 56.

6 *Id.*

7 E.g., Water Code § 22075 et seq. (irrigation districts); Water Code § 35400 et seq. (California water districts).

8 See, e.g., Water Code Divisions 11 through 21.

9 E.g., *Imperial Irrigation District v. State Water Resources Control Board* (1990) 255 Cal.App.3d 548, 566 ["Irrigation districts . . . are public agencies performing governmental functions . . . ."]; *Northeast Sacramento Cty. Sanitation Dist. v. Northridge Park Cty. Water Dist.* (1966) 247 Cal.App.3d 317, 325 ["[Whatever] local government is authorized to do constitutes a function of government"]; *Johnson v. Arvin-Edison Water Storage Dist.* (2009) 174 Cal.App.4th 729, 741.

DWR's arguments are also inapt to the extent they rely almost exclusively on early-20th century tort cases that attempted to distinguish between "governmental" as opposed to "corporate" or "proprietary" functions of government.[10] This line of reasoning was rejected by the California Supreme Court in 1961 in *Muskopf v. Corning Hospital District* (*Muskopf*),[11] and in any event has never been applied to subvention cases. DWR attempts to argue that this distinction applies in modern subvention cases because one subvention case, *Carmel Valley Fire Protection District v. State of California* (*Carmel Valley*),[12] cited a "pre-*Muskopf* sovereign immunity case" and therefore somehow resurrected the rejected doctrine.[13] However, the case in question is actually post-*Muskopf* and does not rely on the rejected logic.[14] Instead, the cited text states only that certain sections of the Government Code control governmental tort immunity for fire protection efforts, among others.[15] To construe that case or *Carmel Valley* as relying on or supporting the pre-*Muskopf* corporate/governmental distinctions is wholly inaccurate.

Even if this distinction did apply here, DWR admits that "[t]he relative number of public versus private entities engaged in an activity" could be relevant in "determining whether an activity constitutes a 'governmental function.'"[16] Here, no fewer than 83.7% of the urban water suppliers affected by the statutes and regulations at issue are governmental entities.[17] And DWR does not assert—nor have Claimants found—that *any* of the agricultural water suppliers affected by the test claim statutes and regulations (those that serve at least 25,000 irrigated acres) are

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[10] DWR Letter at pp. 4-6.

[11] (1961) 55 Cal.2d 211.

[12] (1987) 190 Cal.App.3d 521, 537.

[13] DWR Letter at p. 6

[14] See *County of Sacramento v. Superior Court* (1972) 8 Cal.3d 479, 481, as cited in *Carmel Valley Fire Protection Dist. v. State of California* (1987) 190 Cal.App.3d 521, 537.

[15] See *County of Sacramento, supra,* 8 Cal.3d at pp. 481-482 (implicitly referring to, *inter alia,* Government Code § 850 et seq.).

[16] DWR Letter at p. 1.

[17] DWR Letter at p. 3. This lower figure is based on DWR's calculation. We note that the list of "public" and "private" water service entities appended to DWR's comment letter contains errors. On page 2 of the list of "private retail water suppliers," DWR has included South Feather Water and Power Agency as a private supplier. South Feather is a public agency—an irrigation district—and is one of the public agency test claimants herein. This list also includes 21 separate entries for California Water Services Company, 17 entries for Golden West Water Company, and 5 entries for California-American Water Company. There are actually only 30 total private urban water suppliers affected by these mandates, compared to 370 public entities. As such, only 7.5% of the urban water suppliers affected by the test claim statutes and regulations are private entities, and 92.5% are public entities. (These numbers differ slightly from those found in the August 7, 2013, Claimants' Rebuttal because the October 17, 2014, DWR Letter used more recent data.)

private entities.[18] The agricultural water conservation mandates are directed entirely to public agencies.

Given that water service in California is overwhelmingly provided by government agencies, DWR's claim that water service is not a "governmental function" is not supported by the facts. Further, California statutes and jurisprudence recognize that the provision of water service by governmental entities created for that purpose is a governmental function. Because the statutes and regulations at issue constitute "programs that carry out the governmental function of providing services to the public," they are the proper subject for these consolidated test claims.

II. The Statutes and Regulations at Issue Here "Impose Unique Requirements on Local Governments and Do Not Apply Generally to All Residents and Entities in the State."

DWR argues that "a law that governs private and public entities alike is not a 'program' for purposes of" state subvention,[19] because it applies generally to all residents and entities in the state and does not impose unique requirements on local government. DWR further argues that the "relative proportion" of public versus private entities affected by a law is "not relevant" to this determination.[20] These arguments are incorrect and are disproven in the very authority upon which DWR relies.

In *Carmel Valley*, the court found that a new law requiring all fire protection entities in the state to purchase certain protective clothing and equipment was a new mandate reimbursable under Section 6.[21] Although the court explicitly acknowledged that "private sector fire fighters" were also subject to the mandate, it held that "[t]he requirements imposed on local governments are . . . unique because fire fighting is *overwhelmingly* engaged in by local agencies."[22] The fact that the law also applied to private entities did not affect the court's finding that the new laws constituted a "program" for subvention purposes. The court held that the law was not a law of general application, even though it applied to all public and private firefighting entities alike, because "the orders do not apply generally to all residents and entities in the State *but only to those involved in fire fighting*."[23]

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[18] Water Code §§ 10608.12, subd. (a), 10853; 23 C.C.R. § 597.1, subd. (a); See also Exhibit A to Decl. of Dustin C. Cooper in Support of Claimants' Rebuttal dated August 7, 2013 (Document 67).

[19] DWR Letter at p. 2.

[20] *Id.* at 3.

[21] *Carmel Valley Fire Protection Dist. v. State of California* (1987) 190 Cal.App.3d 521.

[22] *Id.* at pp. 537-538 (emphasis added).

[23] *Id.* at p. 538 (emphasis added).

Here, the new mandates "impose unique requirements on local governments"[24] because the provision of water service "is overwhelmingly engaged in by local agencies."[25] The new mandates "do not apply generally to all residents and entities in the State but only to those involved in" providing water service.[26] Because the statutes and regulations at issue here also fall within the second definition of "program," and impose unique requirements on local government, the new mandates are an appropriate subject for these consolidated test claims and Claimants are entitled to reimbursement.[27]

III. DWR's Arguments, If Accepted, Would Preclude Constitutional Subvention For Practically All Potential Claimants.

According to DWR, a new state mandate imposed on local governments would only be reimbursable if the newly mandated activity is "uniquely governmental in nature" and an "exclusively governmental function."[28] This would preclude subvention for most claimants. The People of California did not intend Section 6 to be limited in such a severe manner when they passed the Constitutional amendment creating the subvention requirement.[29] Nor have the courts interpreted this Constitutional provision in such a limited manner.[30]

Such an interpretation would remove entire classes of claimants from eligibility for subvention when, in many cases, the Commission has already determined them to be eligible. For instance, DWR's interpretation would exclude schools and community college districts from subvention because there are private schools and colleges in the state that perform the same "functions" as the public institutions. The Commission has already decided this issue in favor if their eligibility,[31] as have the courts[32]. Also eliminated from eligibility for subvention would be the hundreds of local governmental agencies governed by publicly elected boards that provide water, sewer, refuse collection, energy, and other services, because there are some private entities that perform those functions as well. Even public animal shelters would be deemed

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[24] *County of Los Angeles, supra,* 43 Cal.3d at p. 56.

[25] *Carmel Valley Fire Protection Dist., supra,* 190 Cal.App.3d at p. 538.

[26] *Id.*

[27] *Id.* at p. 537.

[28] DWR Letter at pp. 5, 7.

[29] See California Ballot Pamphlet, Special Statewide Election, November 6, 1979, at pp. 16-22 (included as Exhibit D to Claimants' Response to Request for Additional Information 10-TC-12 and 12-TC-01, filed September 23, 2013).

[30] See, e.g., *Carmel Valley, supra,* 190 Cal.App.3d at pp. 537-538.

[31] E.g., 00-TC-05 at p. 8.

[32] E.g., *Long Beach USD v. State of California* (1990) 225 Cal.App.3d 155, 172, citing *Carmel Valley, supra,* 190 Cal.App.3d at p. 537.

ineligible for subvention due to the existence of private shelters, when the Commission has already determined animal shelters to be eligible.[33]

IV. Conclusion.

For the reasons explained above, the Commission should not accept DWR's proffered arguments. Instead, the Commission should find that the Claimants in the consolidated test claims are eligible and entitled to reimbursement for the new state mandates at issue in these proceedings.

Respectfully submitted,

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[33] See 98-TC-11.

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Yolo 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 13, 2014, I served the:

Claimant Comments
Water Conservation, 10-TC-12 and 12-TC-01
Water Conservation Act of 2009 et al.
South Feather Water and Power Agency, Paradise Irrigation District, Richvale Irrigation District, Biggs-West Gridley Water District, Oakdale Irrigation District, and Glenn-Colusa Irrigation 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 November 13, 2014 at Sacramento, California.

Jason Hone
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/24/14

Claim Number: 10-TC-12 and 12-TC-01

Matter: Water Conservation

Claimants: Glenn-Colusa Irrigation District
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TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

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