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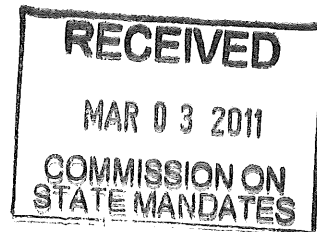
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March 3, 2011



Mr. Drew Bohan
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, California 95814

Dear Mr. Bohan:

**LOS ANGELES COUNTY'S REVISED
PARAMETERS AND GUIDELINES ALLOWING GRAFFITI REMOVAL COSTS
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES TEST CLAIMS**

Los Angeles County respectfully submits revised language for sections IV.B.2. and IV.B.3. of the parameters and guidelines we filed on February 24, 2011 to now read:

IV.B.2. Inspection of receptacles and pads for wear, cleaning, emptying and other maintenance needs.

IV.B.3. Maintenance of receptacles and pads, including painting, cleaning and repair of receptacles, replacement of liners, cost of paints, cleaning supplies and liners, and graffiti removal.

Mr. William Yan, an engineer with our Department of Public Works, provides substantial evidence, in his attached declaration, that graffiti removal activities are reasonably necessary for the mandatory reduction of storm water pollutants. If you have any questions, please contact Leonard Kaye at (213) 974-9791 or via e-mail at lkaye@auditor.lacounty.gov.

Very truly yours,

Wendy L. Watanabe
Auditor-Controller

WLW:MMO:JN:CY:lk

H:\SB90\A 02 11++ Storm water Ps&Gs Hearing/Cover letter 03 03 11

Enclosure

County of Los Angeles
Transit Trash Receptacle Graffiti Removal Requirements
Municipal Storm Water and Urban Runoff Discharges Test Claim
California Regional Water Quality Control board
Executive Order Number 01-182, December 13, 2001
Permit Number CAS004001, Part 4, Section F.5.c.3.

Declaration of William Yan

William Yan makes the following declaration and statement under oath:

I, William Yan, Associate Civil Engineer, in the Programs Development Division of the County of Los Angeles County Department of Public Works, declare that I have examined Section SC-70 "Road and Street Maintenance" of the California Stormwater Best Management Practices Municipal Handbook, issued in January 2003, attached, hereinafter referred to as Section SC-70.

I declare that Section SC-70 states, on page 1, that:

"Streets, roads, and highways are significant sources of pollutants in stormwater discharges, and operation and maintenance (O&M) practices, if not conducted properly, can contribute to the problem. Stormwater pollution from roadway and bridge maintenance should be addressed on a site-specific basis. Use of the procedures outlined below, that address street sweeping and repair, bridge and structure maintenance, and unpaved roads will reduce pollutants in stormwater. "

I declare that Section SC-70 indicates, on page 1, that an approach to "pollution prevention" is to:

"Use the least toxic materials available (e.g. water based paints, gels or sprays for graffiti removal)."

I declare that Section SC-70, on page 5, describes procedures and activities that are reasonably necessary in removing graffiti:

- Schedule graffiti removal activities for dry weather.

- Protect nearby storm drain inlets prior to removing graffiti from walls, signs, sidewalks, or other structures needing graffiti abatement.

Clean up afterwards by sweeping or vacuuming thoroughly, and/or by using absorbent and properly disposing of the absorbent.

When graffiti is removed by painting over, implement the procedures under Painting and Paint Removal above.

Direct runoff from sand blasting and high pressure washing (with no cleaning agents) into a landscaped or dirt area. If such an area is not available, filter runoff through an appropriate filtering device (e.g. filter fabric) to keep sand, particles, and debris out of storm drains.

If a graffiti abatement method generates wash water containing a cleaning compound (such as high pressure washing with a cleaning compound), plug nearby storm drains and vacuum/pump wash water to the sanitary sewer.

Consider using a waterless and non-toxic chemical cleaning method for graffiti removal (e.g. gels or spray compounds)."

I declare that it is my information or belief that the "other structures needing graffiti abatement" referred to above, includes trash receptacles placed at bus stops in accordance with Part 4, Section F.5.c.3. of Permit Number CAS004001.

I declare that two County declarations were filed regarding removal of graffiti from trash receptacles (by Gino Sotelo on February 15, 2011 and by Alan Mudge on February 17, 2011) and indicated that the costs of trash receptacle graffiti removal are negligible and not included in the costs of cleaning the trash receptacles claimed herein.

Nevertheless, I declare that it is my information or belief that the costs of trash receptacle graffiti removal or cleaning if charged to, or incurred by, eligible claimant(s) would be reimbursable because such activities are reasonably necessary activities in reducing stormwater pollutants.

Accordingly, I declare that it is my information or belief that Section IV.B.2. and Section IV.B.3., regarding reimbursable on-going maintenance activities for trash receptacles and pads, of the parameters and guidelines for the Municipal Storm Water and Urban Runoff Discharges reimbursement program filed by the County of Los Angeles with the Commission on State Mandates on February 23, 2011, should be revised to read as follows:

IV.B.2. Inspection of receptacles and pads for wear, cleaning, emptying and other maintenance needs.

IV.B.3. Maintenance of receptacles and pads, including painting, cleaning and repair of receptacles, replacement of liners, cost of paints, cleaning supplies and liners, and graffiti removal.

I am personally conversant with the foregoing facts and, if so required, I could and would testify to the statements made herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to the matters which are therein stated as information or belief, and as to those matters I believe them to be true.

3/2/11 ALHAMBRA
Date and Place


Signature



Description

Streets, roads, and highways are significant sources of pollutants in stormwater discharges, and operation and maintenance (O&M) practices, if not conducted properly, can contribute to the problem. Stormwater pollution from roadway and bridge maintenance should be addressed on a site-specific basis. Use of the procedures outlined below, that address street sweeping and repair, bridge and structure maintenance, and unpaved roads will reduce pollutants in stormwater.

Approach

Pollution Prevention

- Use the least toxic materials available (e.g. water based paints, gels or sprays for graffiti removal)
- Recycle paint and other materials whenever possible.
- Enlist the help of citizens to keep yard waste, used oil, and other wastes out of the gutter.

Suggested Protocols

Street Sweeping and Cleaning

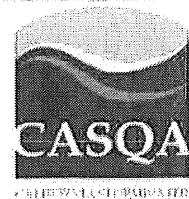
- Maintain a consistent sweeping schedule. Provide minimum monthly sweeping of curbed streets.
- Perform street cleaning during dry weather if possible.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



- Avoid wet cleaning or flushing of street, and utilize dry methods where possible.
- Consider increasing sweeping frequency based on factors such as traffic volume, land use, field observations of sediment and trash accumulation, proximity to water courses, etc. For example:
 - Increase the sweeping frequency for streets with high pollutant loadings, especially in high traffic and industrial areas.
 - Increase the sweeping frequency just before the wet season to remove sediments accumulated during the summer.
 - Increase the sweeping frequency for streets in special problem areas such as special events, high litter or erosion zones.
- Maintain cleaning equipment in good working condition and purchase replacement equipment as needed. Old sweepers should be replaced with new technologically advanced sweepers (preferably regenerative air sweepers) that maximize pollutant removal.
- Operate sweepers at manufacturer requested optimal speed levels to increase effectiveness.
- To increase sweeping effectiveness consider the following:
 - Institute a parking policy to restrict parking in problematic areas during periods of street sweeping.
 - Post permanent street sweeping signs in problematic areas; use temporary signs if installation of permanent signs is not possible.
 - Develop and distribute flyers notifying residents of street sweeping schedules.
- Regularly inspect vehicles and equipment for leaks, and repair immediately.
- If available use vacuum or regenerative air sweepers in the high sediment and trash areas (typically industrial/commercial).
- Keep accurate logs of the number of curb-miles swept and the amount of waste collected.
- Dispose of street sweeping debris and dirt at a landfill.
- Do not store swept material along the side of the street or near a storm drain inlet.
- Keep debris storage to a minimum during the wet season or make sure debris piles are contained (e.g. by berming the area) or covered (e.g. with tarps or permanent covers).

Street Repair and Maintenance

Pavement marking

- Schedule pavement marking activities for dry weather.

- Develop paint handling procedures for proper use, storage, and disposal of paints.
- Transfer and load paint and hot thermoplastic away from storm drain inlets.
- Provide drop cloths and drip pans in paint mixing areas.
- Properly maintain application equipment.
- Street sweep thermoplastic grindings. Yellow thermoplastic grindings may require special handling as they may contain lead.
- Paints containing lead or tributyltin are considered a hazardous waste and must be disposed of properly.
- Use water based paints whenever possible. If using water based paints, clean the application equipment in a sink that is connected to the sanitary sewer.
- Properly store leftover paints if they are to be kept for the next job, or dispose of properly.

Concrete installation and repair

- Schedule asphalt and concrete activities for dry weather.
- Take measures to protect any nearby storm drain inlets and adjacent watercourses, prior to breaking up asphalt or concrete (e.g. place sand bags around inlets or work areas).
- Limit the amount of fresh concrete or cement mortar mixed, mix only what is needed for the job.
- Store concrete materials under cover, away from drainage areas. Secure bags of cement after they are open. Be sure to keep wind-blown cement powder away from streets, gutters, storm drains, rainfall, and runoff.
- Return leftover materials to the transit mixer. Dispose of small amounts of hardened excess concrete, grout, and mortar in the trash.
- Do not wash sweepings from exposed aggregate concrete into the street or storm drain. Collect and return sweepings to aggregate base stockpile, or dispose in the trash.
- When making saw cuts in pavement, use as little water as possible and perform during dry weather. Cover each storm drain inlet completely with filter fabric or plastic during the sawing operation and contain the slurry by placing straw bales, sandbags, or gravel dams around the inlets. After the liquid drains or evaporates, shovel or vacuum the slurry residue from the pavement or gutter and remove from site. Alternatively, a small onsite vacuum may be used to pick up the slurry as this will prohibit slurry from reaching storm drain inlets.
- Wash concrete trucks off site or in designated areas on site designed to preclude discharge of wash water to drainage system.

Patching, resurfacing, and surface sealing

- Schedule patching, resurfacing and surface sealing for dry weather.
- Stockpile materials away from streets, gutter areas, storm drain inlets or watercourses. During wet weather, cover stockpiles with plastic tarps or berm around them if necessary to prevent transport of materials in runoff.
- Pre-heat, transfer or load hot bituminous material away from drainage systems or watercourses.
- Where applicable, cover and seal nearby storm drain inlets (with waterproof material or mesh) and maintenance holes before applying seal coat, slurry seal, etc. Leave covers in place until job is complete and until all water from emulsified oil sealants has drained or evaporated. Clean any debris from covered maintenance holes and storm drain inlets when the job is complete.
- Prevent excess material from exposed aggregate concrete or similar treatments from entering streets or storm drain inlets. Designate an area for clean up and proper disposal of excess materials.
- Use only as much water as necessary for dust control, to avoid runoff.
- Sweep, never hose down streets to clean up tracked dirt. Use a street sweeper or vacuum truck. Do not dump vacuumed liquid in storm drains.
- Catch drips from paving equipment that is not in use with pans or absorbent material placed under the machines. Dispose of collected material and absorbents properly.

Equipment cleaning maintenance and storage

- Inspect equipment daily and repair any leaks. Place drip pans or absorbent materials under heavy equipment when not in use.
- Perform major equipment repairs at the corporation yard, when practical.
- If refueling or repairing vehicles and equipment must be done onsite, use a location away from storm drain inlets and watercourses.
- Clean equipment including sprayers, sprayer paint supply lines, patch and paving equipment, and mud jacking equipment at the end of each day. Clean in a sink or other area (e.g. vehicle wash area) that is connected to the sanitary sewer.

*Bridge and Structure Maintenance**Paint and Paint Removal*

- Transport paint and materials to and from job sites in containers with secure lids and tied down to the transport vehicle.
- Do not transfer or load paint near storm drain inlets or watercourses.

- Test and inspect spray equipment prior to starting to paint. Tighten all hoses and connections and do not overfill paint container.
- Plug nearby storm drain inlets prior to starting painting where there is significant risk of a spill reaching storm drains. Remove plugs when job is completed.
- If sand blasting is used to remove paint, cover nearby storm drain inlets prior to starting work.
- Perform work on a maintenance traveler or platform, or use suspended netting or tarps to capture paint, rust, paint removing agents, or other materials, to prevent discharge of materials to surface waters if the bridge crosses a watercourse. If sanding, use a sander with a vacuum filter bag.
- Capture all clean-up water, and dispose of properly.
- Recycle paint when possible (e.g. paint may be used for graffiti removal activities). Dispose of unused paint at an appropriate household hazardous waste facility.

Graffiti Removal

- Schedule graffiti removal activities for dry weather.
- Protect nearby storm drain inlets prior to removing graffiti from walls, signs, sidewalks, or other structures needing graffiti abatement. Clean up afterwards by sweeping or vacuuming thoroughly, and/or by using absorbent and properly disposing of the absorbent.
- When graffiti is removed by painting over, implement the procedures under Painting and Paint Removal above.
- Direct runoff from sand blasting and high pressure washing (with no cleaning agents) into a landscaped or dirt area. If such an area is not available, filter runoff through an appropriate filtering device (e.g. filter fabric) to keep sand, particles, and debris out of storm drains.
- If a graffiti abatement method generates wash water containing a cleaning compound (such as high pressure washing with a cleaning compound), plug nearby storm drains and vacuum/pump wash water to the sanitary sewer.
- Consider using a waterless and non-toxic chemical cleaning method for graffiti removal (e.g. gels or spray compounds).

Repair Work

- Prevent concrete, steel, wood, metal parts, tools, or other work materials from entering storm drains or watercourses.
- Thoroughly clean up the job site when the repair work is completed.
- When cleaning guardrails or fences follow the appropriate surface cleaning methods (depending on the type of surface) outlined in SC-71 Plaza & Sidewalk Cleaning fact sheet.

- If painting is conducted, follow the painting and paint removal procedures above.
- If graffiti removal is conducted, follow the graffiti removal procedures above.
- If construction takes place, see the Construction Activity BMP Handbook.
- Recycle materials whenever possible.

Unpaved Roads and Trails

- Stabilize exposed soil areas to prevent soil from eroding during rain events. This is particularly important on steep slopes.
- For roadside areas with exposed soils, the most cost-effective choice is to vegetate the area, preferably with a mulch or binder that will hold the soils in place while the vegetation is establishing. Native vegetation should be used if possible.
- If vegetation cannot be established immediately, apply temporary erosion control mats/blankets; a comma straw, or gravel as appropriate.
- If sediment is already eroded and mobilized in roadside areas, temporary controls should be installed. These may include: sediment control fences, fabric-covered triangular dikes, gravel-filled burlap bags, biobags, or hay bales staked in place.

Non-Stormwater Discharges

Field crews should be aware of non-stormwater discharges as part of their ongoing street maintenance efforts.

- Refer to SC-10 Non-Stormwater Discharges
- Identify location, time and estimated quantity of discharges.
- Notify appropriate personnel.

Training

- Train employees regarding proper street sweeping operation and street repair and maintenance.
- Instruct employees and subcontractors to ensure that measures to reduce the stormwater impacts of roadway/bridge maintenance are being followed.
- Require engineering staff and/or consulting A/E firms to address stormwater quality in new bridge designs or existing bridge retrofits.
- Use a training log or similar method to document training.
- Train employees on proper spill containment and clean up, and in identifying non-stormwater discharges.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup.
- Keep your Spill Prevention Control and countermeasure (SPCC) plan up-to-date, and implement accordingly.
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- Densely populated areas or heavily used streets may require parking regulations to clear streets for cleaning.
- No currently available conventional sweeper is effective at removing oil and grease. Mechanical sweepers are not effective at removing finer sediments.
- Limitations may arise in the location of new bridges. The availability and cost of land and other economic and political factors may dictate where the placement of a new bridge will occur. Better design of the bridge to control runoff is required if it is being placed near sensitive waters.

Requirements

Costs

- The maintenance of local roads and bridges is already a consideration of most community public works or transportation departments. Therefore, the cost of pollutant reducing management practices will involve the training and equipment required to implement these new practices.
- The largest expenditures for street sweeping programs are in staffing and equipment. The capital cost for a conventional street sweeper is between \$60,000 and \$120,000. Newer technologies might have prices approaching \$180,000. The average useful life of a conventional sweeper is about four years, and programs must budget for equipment replacement. Sweeping frequencies will determine equipment life, so programs that sweep more often should expect to have a higher cost of replacement.
- A street sweeping program may require the following.
 - Sweeper operators, maintenance, supervisory, and administrative personnel are required.
 - Traffic control officers may be required to enforce parking restrictions.
 - Skillful design of cleaning routes is required for program to be productive.
 - Arrangements must be made for disposal of collected wastes.

- If investing in newer technologies, training for operators must be included in operation and maintenance budgets. Costs for public education are small, and mostly deal with the need to obey parking restrictions and litter control. Parking tickets are an effective reminder to obey parking rules, as well as being a source of revenue.

Maintenance

- Not applicable

Supplemental Information**Further Detail of the BMP***Street sweeping*

There are advantages and disadvantages to the two common types of sweepers. The best choice depends on your specific conditions. Many communities find it useful to have a compliment of both types in their fleet.

Mechanical Broom Sweepers - More effective at picking up large debris and cleaning wet streets. Less costly to purchase and operate. Create more airborne dust.

Vacuum Sweepers - More effective at removing fine particles and associated heavy metals. Ineffective at cleaning wet streets. Noisier than mechanical broom sweepers which may restrict areas or times of operation. May require an advance vehicle to remove large debris.

Street Flushers - Not affected by biggest interference to cleaning, parked cars. May remove finer sediments, moving them toward the gutter and stormwater inlets. For this reason, flushing fell out of favor and is now used primarily after sweeping. Flushing may be effective for combined sewer systems. Presently street flushing is not allowed under most NPDES permits.

Cross-Media Transfer of Pollutants

The California Air Resources Board (ARB) has established state ambient air quality standards including a standard for respirable particulate matter (less than or equal to 10 microns in diameter, symbolized as PM₁₀). In the effort to sweep up finer sediments to remove attached heavy metals, municipalities should be aware that fine dust, that cannot be captured by the sweeping equipment and becomes airborne, could lead to issues of worker and public safety.

Bridges

Bridges that carry vehicular traffic generate some of the more direct discharges of runoff to surface waters. Bridge scupper drains cause a direct discharge of stormwater into receiving waters and have been shown to carry relatively high concentrations of pollutants. Bridge maintenance also generates wastes that may be either directly deposited to the water below or carried to the receiving water by stormwater. The following steps will help reduce the stormwater impacts of bridge maintenance:

- Site new bridges so that significant adverse impacts to wetlands, sensitive areas, critical habitat, and riparian vegetation are minimized.

- Design new bridges to avoid the use of scupper drains and route runoff to land for treatment control. Existing scupper drains should be cleaned on a regular basis to avoid sediment/debris accumulation.
- Reduce the discharge of pollutants to surface waters during maintenance by using suspended traps, vacuums, or booms in the water to capture paint, rust, and paint removing agents. Many of these wastes may be hazardous. Properly dispose of this waste by referring to CA21 (Hazardous Waste Management) in the Construction Handbook.
- Train employees and subcontractors to reduce the discharge of wastes during bridge maintenance.

De-icing

- Do not over-apply deicing salt and sand, and routinely calibrate spreaders.
- Near reservoirs, restrict the application of deicing salt and redirect any runoff away from reservoirs.
- Consider using alternative deicing agents (less toxic, biodegradable, etc.).

References and Resources

Model Urban Runoff Program: A How-To Guide for Developing Urban Runoff Programs for Small Municipalities. Prepared by City of Monterey, City of Santa Cruz, California Coastal Commission, Monterey Bay National Marine Sanctuary, Association of Monterey Bay Area Governments, Woodward-Clyde, Central Coast Regional Water Quality Control Board. July 1998.

Orange County Stormwater Program

http://www.ocwatersheds.com/stormwater/swp_introduction.asp

Oregon Association of Clean Water Agencies. Oregon Municipal Stormwater Toolbox for Maintenance Practices. June 1998.

Santa Clara Valley Urban Runoff Pollution Prevention Program. 1997 Urban Runoff Management Plan. September 1997, updated October 2000.

Santa Clara Valley Urban Runoff Pollution Prevention Program. 2001. Fresh Concrete and Mortar Application Best Management Practices for the Construction Industry. June.

Santa Clara Valley Urban Runoff Pollution Prevention Program. 2001. Roadwork and Paving Best Management Practices for the Construction Industry. June.

United States Environmental Protection Agency (USEPA). 2002. Pollution Prevention/Good Housekeeping for Municipal Operations Roadway and Bridge Maintenance. On-line http://www.epa.gov/npdes/menuofbmeps/poll_13.htm

Commission on State Mandates

Original List Date:

Last Updated: 2/25/2011

List Print Date: 03/04/2011

Claim Number: 03-TC-04, 19, 20, 21

Issue: Municipal Stormwater and Urban Runoff Discharges

Mailing List

TO ALL PARTIES AND INTERESTED PARTIES:

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, § 1181.2.)

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Mr. Jay Lal State Controller's Office (B-08) Division of Accounting & Reporting 3301 C Street, Suite 700 Sacramento, CA 95816	Tel: (916) 324-0256 Email: JLal@sco.ca.gov Fax: (916) 323-6527
Ms. Jolene Tollenaar MGT of America 2001 P Street, Suite 200 Sacramento, CA 95811	Tel: (916) 443-9136 Email: jolene_tollenaar@mgtamer.com Fax: (916) 443-1766

COMMISSION ON STATE MANDATES

980 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814
PHONE: (916) 323-3562
FAX: (916) 445-0278
E-mail: csminfo@csm.ca.gov

**DECLARATION OF SERVICE BY EMAIL**

I, the undersigned, declare as follows:

I am a resident of the County of Solano 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 4, 2011, I served the:

Co-Claimant County Revised Language for Ccomments

Municipal Storm Water and Urban Runoff Discharges

03-TC-04, 03-TC-19, 03-TC-20, 03-TC-21

Los Angeles Regional Quality Control Board Order No. 01-182

Permit CAS004001; Part 4F5c3

County of Los Angeles, Cities of Artesia, Beverly Hills, Carson, Norwalk, Rancho Palos Verdes, Westlake Village, Azusa, Commerce, Vernon, Bellflower, Covina, Downey, Monterey Park, Signal Hill, Co-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 March 4, 2011 at Sacramento, California.

A handwritten signature in cursive script, appearing to read "Heidi J. Palchik", written over a horizontal line.

Heidi J. Palchik