



Anya Kwan
Associate
(213) 542-3867
anya.kwan@bbklaw.com

May 16, 2025

RECEIVED
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**Commission on
State Mandates**

VIA CSM DROPBOX

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

Re: SAN DIEGO UNIFIED PORT DISTRICT AND SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY COMMENTS ON REVISED
DRAFT PROPOSED DECISION AND PARAMETERS AND
GUIDELINES, TEST CLAIM 07-TC-09-R

Dear Ms. Halsey:

The San Diego County Regional Airport Authority (“Airport Authority”) and the San Diego Unified Port District (“Port District”) (collectively, “Special Districts”) submit these comments in response to the Revised Draft Proposed Decision and Parameters and Guidelines for Test Claim 07-TC-09-R (“Revised Proposed Decision”). We appreciate the work that the Commission on State Mandates (“Commission”) has invested in the Revised Proposed Decision and submit these comments to urge a revision to the Revised Proposed Decision that recognizes the Special Districts as eligible claimants under Test Claim 07-TC-09 (“Test Claim”).

BACKGROUND

The Port District was created by the State of California and approved by voters in Chula Vista, Coronado, Imperial Beach, National City, and San Diego in 1962 to manage the tidelands and submerged lands of San Diego Bay.¹ The Port District is governed by the applicable Harbors & Navigation Codes Sections and Appendixes. The Airport Authority was created on January 1, 2003, as an independent agency to manage the day-to-day operations of San Diego International Airport and address the region’s long-term air transportation needs.² The Airport Authority is governed by the applicable Public Utilities Code Sections.

Both Special Districts have and maintain stormwater systems. The Special Districts’ storm drain systems collect surface and storm waters on their own properties and discharge that water offsite. Parts of the Special Districts’ stormwater systems interconnect with other public stormwater systems.

¹ Cal. Harb. & Nav. Code, appx. I.

² Pub. Util. Code, div. 17.

The Special Districts were both subject to R9-2007-001, National Pollutant Discharge Elimination System (“NPDES”) No. CAS0108758 (“Permit”), along with the County of San Diego and the Incorporated Cities of San Diego (“Municipal Claimants”). This Permit required both the Municipal Claimants and the Special Districts to perform certain activities that were completed by both the Municipal Claimants and the Special Districts. Since both the Municipal Claimants and the Special District had to perform these mandated activities, both groups are eligible claimants.

In the Draft Proposed Decision and Parameters and Guidelines for Test Claim 07-TC-09 (“Proposed Decision”), the Commission determined that the Special Districts were not eligible for reimbursement under Section 6 of Article XIII B of the California Constitution (“Section 6”) because the Special Districts are not subject to the appropriations limit found in Article XIII B of the California Constitution (“Article XIII B”). The Commission argues that the Special Districts are exempt from the appropriations limits by Section 9(c) of Article XIII B of the California Constitution (“Section 9(c)”) because the Special Districts’ revenues are not proceeds of taxes which makes them exempt from Article XIII B’s spending limit. The Commission’s interpretation of Section 9(c) is based on its use of the definition of “local agencies” found in Government Code section 7901(e) (“Section 7901”).

In Special Districts’ comments on the Proposed Decision, dated and received by the Commission on February 16, 2024, the Special Districts argued that they are eligible for reimbursement under Section 6 because Section 6 involves “local governments” and the Special Districts satisfy the definition of “local governments” as defined by Section 8 of Article XIII B of the California Constitution (“Section 8”). The Special Districts also rebutted the Commission’s disqualification of reimbursements for the Special Districts by arguing (1) that the taxation requirements in Section 7901 definition of local agencies does not apply to Section 6 because the definition of “local government” contained in Section 8 governs the interpretation of eligibility for reimbursement under Section 6, (2) even if taxing authority was a requirement for reimbursement, both the Airport Authority and the Port District satisfy the requirement because they each individually have the power to levy taxes, and (3) equity requires reimbursement.

In the Revised Proposed Decision, released following the Special Districts’ comment letter, the Commission reiterates the claim that the Special Districts are ineligible for claim reimbursement under Section 6.³ Specifically, the Commission again argues that the Special Districts are not local agencies eligible under reimbursement because they do not satisfy the definition of “local agencies” found in Government Code section 7901(e).⁴ The Commission acknowledges that the definition in Section 8 applies, however the Commission explains that the definition in Section 7901 controls because there is no conflict between Section 7901(d) and Section 8 and where there is no conflict, the general definition should apply.

³ Revised Proposed Decision, IV.A.

⁴ *Id.* at 2.

DISCUSSION

The Special Districts respectfully request reconsideration of the decision to not include the Special Districts as eligible claimants under the Test Claim. The Special Districts believe they should be entitled to reimbursement under Section 6 because the plain language demonstrates that the Special Districts are eligible claimants. First, there is no indication that the definition of “local agency” found in Section 7901(e) is meant to apply to Section 6 as Section 6 uses the term “local government.” Second, if the Commission is to use the general definition of “local agency” to interpret Article XIII B, it should use the “local agency” definition found in Government Code section 17518, which implements Section 6.

I. The Special Districts Are Eligible Claimants Because They Are a Type of Local Government That Is Entitled to Reimbursement by Section 6

Section 6 requires reimbursement to “local governments.” A “local government” is not the same as a “local agency.” The Commission argues that the Special Districts are not entitled to reimbursement under Section 6 because the Special Districts are excluded from the definition of “local agency” found in Section 7901(e).

Section 6 mandates reimbursement “whenever the Legislature or any state agency mandates a new program or higher level of service on *any local government*.” (Emphasis added.) “Local governments” are defined in Section 8(d) as “any city, county, city and county, school district, special district, authority, or other political subdivision of or within the State.” The plain language of this definition thus expressly includes “special districts” and “authorities” such as the Special Districts. The plain language clearly means that the state must provide reimbursement whenever it imposes a mandate on any *local government*, including special districts. Since Section 6 through Section 8(d) includes the Special Districts, they are eligible claimants as a matter of law.

The Commission argues that the Special Districts are excluded from reimbursement because they are not subject to the appropriations limitation of Article XIII B.⁵ However, the reimbursement mandate in Section 6 does not include any reference to “appropriations subject to limitation.” Had the drafters of Article XIII B intended Section 9’s exclusions for appropriations subject to limitation to apply to reimbursements made under Section 6, they could have clearly done so.

Additionally, the Commission argues that the Special Districts do not satisfy the definition of a local agency.⁶ Section 6 does not include the term “local agency” and therefore it is irrelevant whether or not the Special Districts satisfy this definition.⁷ The Commission cites to no case law nor any other law that indicates that the Commission can rely on the definition of a different term in interpreting Section 6.

⁵ Revised Proposed Decision, IV.A.

⁶ Revised Proposed Decision, IV.A.

⁷ Section 6 mandates reimbursement “whenever the Legislature or any state agency mandates a new program or higher level of service on *any local government*.”

Therefore, the plain language of Section 6 requires the Commission to use the definition of “local government” in Section 8 instead of the definition of “local agency” in Section 7901(e).

II. If Section 6 is Interpreted to Use the Term Local Agency instead of Local Government, the Definition of “Local Agency” in Section 17518 Should Govern Because Section 7901(e) Is Inconsistent With Section 17518

Section 6 has an implementation statute with a specific definition of “local agency;” this definition governs. The Commission argues that Section 7901(e) directly applies to Section 6 and must be considered when interpreting Article XIII B. The Special Districts maintain that the definition of “local government” contained in Section 8 must govern the interpretation of eligibility under Section 6. However, if the Commission continues to assert that Section 6 applies to local agencies and not local governments, the definition in Government Code section 17518 (“Section 17518”) applies.

Section 7901(e)’s “local agency” definition does not apply to Section 6. The Commission correctly states that Government Code section 7901(e) implements Article XIII B.⁸ Government Code sections 17500 to 17630 implements Section 6.⁹ Government Code section 17500 states that “[i]t is the intent of the Legislature in enacting this part to provide for the implementation of Section 6 of Article XIII B of the California Constitution.” The Legislature also intended these sections to “provide the sole and exclusive procedure by which a local agency or school district may claim reimbursement for costs mandated by the state as required by Section 6 of Article XIII B of the California Constitution.”¹⁰ Therefore, the Commission should use the definition in Section 17518, i.e. the definition applicable to Section 6, to determine that reimbursement is appropriate for the Special Districts under Section 6.

Furthermore, Section 7901 and Section 17518 are in conflict. If general and specific provisions dealing with the same subject are inconsistent, the specific provision governs the general one.¹¹ Therefore, the definition of local agency in Section 17518 must apply.

Section 7901(e) defines local agencies as including special districts but excludes “any district which (1) existed on January 1, 1978, and ... did not levy or have levied on its behalf, an ad valorem property tax rate on all taxable property in the district on the secured roll in excess of 12 ½ cents per one hundred dollars (\$100) of assessed value for the 1977-78 fiscal year[.]” For a special district to be considered a “local agency” under this portion of Section 7901(e), it must have levied or have levied on its behalf, an ad valorem property tax in excess of 12 ½ cents per \$100 of assessed value during the 1977-78 fiscal year.

⁸ Revised Proposed Decision, IV.A., p. 52.

⁹ Government Code § 17500.

¹⁰ Government Code §17552.

¹¹ “If general and specific statutes dealing with the same subject are inconsistent, the specific will prevail over the general.” *People v. Betts* (2005) 34 Cal.4th 1039, 1058; “when a general and particular provision are inconsistent, the latter is paramount to the former.” Code of Civil Procedure § 1859.

Section 17518 defines “local agency” as “any city, county, special district, authority, or other political subdivision of the state.” The Legislature specifies that a “special district” is “any agency of the state that performs governmental or proprietary functions within limited boundaries.”¹²

Because Section 17518 implements Section 6 which is a portion of Article XIII B, the provision that Section 7901 implements, Section 17518 is the specific definition and Section 7901 is the general definition. In comparing Section 7901 and Section 17518, Section 7109(e), the general definition, places additional limits on what is considered a “local agency.” Because Section 17518, the specific definition, is broader than the general definition, the two are in conflict and the broader, specific definition must apply.

“The Commission is required to read the constitutional and statutory provisions together so that they are ‘construed in a manner that gives effect to each, yet does not lead to disharmony with the others.’”¹³ Despite this, the Commission’s interpretation of Section 7901 impermissibly renders Section 17518 irrelevant. If the narrow definition of Section 7901 interprets Section 6, the broad definition in Section 17518 never applies. The reverse is not true because Section 7901’s definition of local agency applies to all the other portions Article XIII B except for Section 6. Therefore, the Commission is required to use the Section 17518 definition if the Commission is relying on the term local agency.

CONCLUSION

For the foregoing reasons, the Special Districts respectfully request to be considered eligible for reimbursement under Section 6. The Special Districts are eligible claimants because they meet the definition of “local governments” eligible for Section 6 reimbursement that is found in Section 8. Additionally, Section 7901(e)’s definition of “local agency” should not be used because it is inconsistent with Section 17518; instead, Section 17518’s definition of “local agency” is the operative definition. As a result, the Special Districts are eligible claimants and should be authorized to submit reimbursement claims.

Pursuant to Title 2, Section 1183.8 and Section 1183.3 of the California Code of Regulations, I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge, information, or belief, and that this declaration is executed on this 16th day of May, 2025, at Los Angeles, California.

Sincerely,



Anya Kwan
for BEST BEST & KRIEGER LLP

¹² Government Code § 17520.

¹³ Revised Proposed Decision, p. 56.

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.

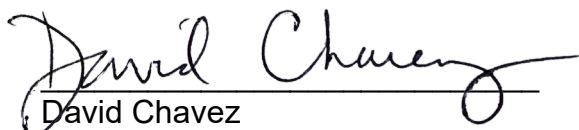
On May 19, 2025, I served the:

- **Current Mailing List dated April 21, 2025**
- **Claimants' Comments on the Revised Draft Proposed Decision and Parameters and Guidelines filed May 16, 2025**
- **San Diego Unified Port District and San Diego County Regional Airport Authority Comments on the Revised Draft Proposed Decision and Parameters and Guidelines filed May 16, 2025**
- **Water Boards' Comments on the Revised Draft Proposed Decision and Parameters and Guidelines filed May 16, 2025**

San Diego Regional Water Quality Control Board Order No. R9-2007-0001, Permit CAS0108758, Parts D.3.a.(3)(b)(iii), D.5.a.(1), D.5.a.(2), D.5.b.(1)(a), D.5.b.(1)(b)(iii-vi), D.5.b.(1)(c), D.5.b.(1)(d), D.5.b.(2), D.5.b.(3), E.2.f., E.2.g., F.1., F.2., F.3., I.1., I.2., I.5., J.3.a.(3)(c)(iv)-(viii), (x)-(xv), the first sentence of L.1. as it applies to the newly mandated activities, and L.1.a.(3)-(6), 07-TC-09-R County of San Diego, Cites of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, and Vista, 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 May 19, 2025 at Sacramento, California.



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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 4/21/25

**Claim
Number:** 07-TC-09-R

Matter: San Diego Regional Water Quality Control Board Order No. R9-2007-0001 Permit CAS0108758 Parts D.1.d.(7)-(8), D.1.g., D.3.a.(3), D.3.a.(5), D.5, E.2.f, E.2.g, F.1, F.2, F.3, I.1, I.2, I.5, J.3.a.(3)(c)iv-viii & x-xv, and L.

Claimants: City of Carlsbad
City of Chula Vista
City of Del Mar
City of Encinitas
City of Escondido
City of Imperial Beach
City of La Mesa
City of Lemon Grove
City of National City
City of Oceanside
City of Poway
City of San Diego
City of San Marcos
City of Santee
City of Solana Beach
City of Vista

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

Tiffany Allen, Treasury Manager, *City of Chula Vista*
Claimant Contact

Finance Department, 276 Fourth Avenue, Chula Vista, CA 91910
Phone: (619) 691-5250
tallen@chulavistaca.gov

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

Donna Apar, Finance Director, *City of San Marcos*
Claimant Contact

1 Civic Center Drive, San Marcos, CA 92069
Phone: (760) 744-1050
dapar@san-marcos.net

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

Ginni Bella Navarre, Deputy Legislative Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8342
Ginni.Bella@lao.ca.gov

Richard Boon, Chief of Watershed Protection Division, *County of Riverside Flood Control District*

1995 Market Street, Riverside, CA 92501

Phone: (951) 955-1273

rboon@rivco.org

Jonathan Borrego, City Manager, *City of Oceanside*

Claimant Contact

300 North Coast Highway, Oceanside, CA 92054

Phone: (760) 435-3065

citymanager@oceansideca.org

Molly Brennan, Director of Finance, *City of National City*

Claimant Contact

1243 National City Blvd., National City, CA 91950

Phone: (619) 336-4330

finance@nationalcityca.gov

Allan Burdick,

7525 Myrtle Vista Avenue, Sacramento, CA 95831

Phone: (916) 203-3608

allanburdick@gmail.com

Guy Burdick, Consultant, *MGT Consulting*

2251 Harvard Street, Suite 134, Sacramento, CA 95815

Phone: (916) 833-7775

gburdick@mgtconsulting.com

Shelby Burguan, Budget Manager, *City of Newport Beach*

100 Civic Center Drive, Newport Beach, CA 92660

Phone: (949) 644-3085

sburguan@newportbeachca.gov

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

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

Erika Cortez, Administrative Services Director, *City of Imperial Beach*
Claimant Contact
825 Imperial Beach Boulevard, Imperial Beach, CA 91932
Phone: (619) 423-8303
ecortez@imperialbeachca.gov

Adam Cripps, Interim Finance Manager, *Town of Apple Valley*
14955 Dale Evans Parkway, Apple Valley, CA 92307
Phone: (760) 240-7000
acripps@applevalley.org

Thomas Deak, Senior Deputy, *County of San Diego*
Claimant Representative
Office of County Counsel, 1600 Pacific Highway, Room 355, San Diego, CA 92101
Phone: (619) 531-4810
Thomas.Deak@sdcounty.ca.gov

Adrian Del Rio, Assistant Director, *City of Chula Vista*
Finance Department, 276 Fourth Ave Bldg A, Chula Vista, CA 91910
Phone: (619) 409-3820
adelrio@chulavistaca.gov

Tracy Drager, Auditor and Controller, *County of San Diego*
Claimant Contact
1600 Pacific Highway, Room 166, San Diego, CA 92101
Phone: (619) 531-5413
tracy.drager@sdcounty.ca.gov

Eric Feller, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
eric.feller@csm.ca.gov

Donna Ferebee, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-8918
donna.ferebee@dof.ca.gov

Kevin Fisher, Assistant City Attorney, *City of San Jose*
Environmental Services, 200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1987
kevin.fisher@sanjoseca.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

Amber Garcia Rossow, Legislative Analyst, *California State Association of Counties*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 650-8170
arossow@counties.org

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

Juliana Gmur, Executive Director, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
juliana.gmur@csm.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

Chris Hill, Principal Program Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, 8th Floor, 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

Christina Holmes, Director of Finance, *City of Escondido*
Claimant Contact
201 North Broadway, Escondido, CA 92025
Phone: (760) 839-4676
cholmes@escondido.org

Rachel Jacobs, Finance Director/Treasurer, *City of Solana Beach*
Claimant Contact
635 South Highway 101, Solana Beach, CA 92075-2215
Phone: (858) 720-2463
rjacobs@cosb.org

Jason Jennings, Director, *Maximus Consulting*
Financial Services, 808 Moorefield Park Drive, Suite 205, Richmond, VA
23236
Phone: (804) 323-3535
SB90@maximus.com

Heather Jennings, Director of Finance, *City of Santee*
Claimant Contact
10601 Magnolia Avenue, Building #3, Santee, CA 92071
Phone: (619) 258-4100
hjennings@cityofsanteeca.gov

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

Anne Kato, Acting Chief, *State Controller's Office*

Local Government Programs and Services Division, 3301 C Street, Suite 740,
Sacramento, CA 95816

Phone: (916) 322-9891

akato@sco.ca.gov

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

Zach Korach, Finance Director, *City of Carlsbad*

Claimant Contact

1635 Faraday Ave., Carlsbad, CA 92008

Phone: (442) 339-2127

zach.korach@carlsbadca.gov

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

Government Law Intake, *Department of Justice*

Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255,
Sacramento, CA 94244-2550

Phone: (916) 210-6046

governmentlawintake@doj.ca.gov

Eric Lawyer, Legislative Advocate, *California State Association of Counties*
(CSAC)

Government Finance and Administration, 1100 K Street, Suite 101,
Sacramento, CA 95814

Phone: (916) 650-8112
elawyer@counties.org

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

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

Kenneth Louie, Chief Counsel, *Department of Finance*
1021 O. Street, Suite 3110, Sacramento, CA 95814
Phone: (916) 322-0971
Kenny.Louie@dof.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

Ensen Mason, Auditor-Controller/Treasurer/Tax Collector, *County of San Bernardino*
268 West Hospitality Lane, San Bernardino, CA 92415-0018
Phone: (909) 387-8322
webinfo@sbcountyatc.gov

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

Michelle Mendoza, *MAXIMUS*

17310 Red Hill Avenue, Suite 340, Irvine, CA 95403

Phone: (949) 440-0845

micellemendoza@maximus.com

Monica Molina, Finance Manager/Treasurer, *City of Del Mar*

Claimant Contact

1050 Camino Del Mar, Del Mar, CA 92014

Phone: (858) 755-9354

mmolina@delmar.ca.us

Jill Moya, Financial Services Director, *City of Oceanside*

300 North Coast Highway, Oceanside, CA 92054

Phone: (760) 435-3887

jmoya@oceansideca.org

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

915 L Street, Sacramento, CA 95814

Phone: (916) 445-8918

Marilyn.Munoz@dof.ca.gov

Tim Nash, Director of Finance, *City of Encinitas*

Claimant Contact

505 S Vulcan Avenue, Encinitas, CA 92054

Phone: N/A

finmail@encinitasca.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

Dale Nielsen, Director of Finance/Treasurer, *City of Vista*

Claimant Contact

Finance Department, 200 Civic Center Drive, Vista, CA 92084

Phone: (760) 726-1340

dnielsen@ci.vista.ca.us

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

Erika Opp, Administrative Analyst, *City of St. Helena*
City Clerk, 1480 Main Street, St. Helena, CA 94574
Phone: (707) 968-2743
eopp@cityofsthelena.gov

Eric Oppenheimer, Executive Director, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814-2828
Phone: (916) 341-5615
eric.oppenheimer@waterboards.ca.gov

Frederick Ortlieb, Senior Deputy City Attorney, *City of San Diego*
1200 Third Avenue, 11th Floor, San Diego, CA 92101
Phone: (619) 236-6318
fortlieb@sandiego.gov

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

Helen Holmes Peak, *Lounsbery Ferguson Altona & Peak, LLP*
960 Canterbury Place, Ste. 300, Escondido, CA 92025
Phone: (760) 743-1201
hhp@lfap.com

Brian Pierik, *Burke, Williams & Sorensen, LLP*
2310 East Ponderosa Drive, Suite 25, Camarillo, CA 93010-4747
Phone: (805) 987-3468
bpierik@bwslaw.com

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

Ashley Rodriguez, Local Government Affairs Manager, *City of Chula Vista*
Finance Department, 276 Fourth Ave Bldg A, Chula Vista, CA 91910
Phone: (619) 409-3820
AClark@chulavistaca.gov

Marco Rodriguez, Accounting Analyst, *City of Lemon Grove*
3232 Main Street, Lemon Grove, CA 91945
Phone: (619) 825-3822
mrodriguez@lemongrove.ca.gov

Lydia Romero, City Manager, *City of Lemon Grove*
Claimant Contact
3232 Main Street, Lemon Grove, CA 91945
Phone: (619) 825-3819
lromero@lemongrove.ca.gov

Tammi Royales, Director of Finance, *City of La Mesa*
Claimant Contact
8130 Allison Avenue, PO Box 937, La Mesa, CA 91944-0937

Phone: (619) 463-6611
findir@cityoflamesa.us

Jessica Sankus, 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
jsankus@counties.org

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

Craig Schmollinger, Director of Finance, *City of Poway*
13325 Civic Center Drive, Poway, CA 92064
Phone: (858) 668-4411
cschmollinger@poway.org

Cindy Sconce, Director, *Government Consulting Partners*
5016 Brower Court, Granite Bay, CA 95746
Phone: (916) 276-8807
cindysconcegcgp@gmail.com

Carla Shelton, Senior Legal Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
carla.shelton@csm.ca.gov

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

Paul Steenhausen, Principal Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, , Sacramento, CA 95814
Phone: (916) 319-8303
Paul.Steenhausen@lao.ca.gov

Julie Testa, Vice Mayor, *City of Pleasanton*
123 Main Street PO Box520, Pleasanton, CA 94566
Phone: (925) 872-6517
Jtesta@cityofpleasantonca.gov

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

Robert Torrez, Interim Chief Financial Officer, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648
Phone: (714) 536-5630
robert.torrez@surfcity-hb.org

Jessica Uzarski, Consultant, *Senate Budget and Fiscal Review Committee*
1020 N Street, Room 502, Sacramento, CA 95814
Phone: (916) 651-4103
Jessica.Uzarski@sen.ca.gov

Matthew Vespi, Chief Financial Officer, *City of San Diego*
Claimant Contact
202 C Street, 9th Floor, San Diego, CA 92101
Phone: (619) 236-6218
mvespi@sandiego.gov

Renee Wellhouse, *David Wellhouse & Associates, Inc.*
3609 Bradshaw Road, H-382, Sacramento, CA 95927
Phone: (916) 797-4883
dwa-renee@surewest.net

Adam Whelen, Director of Public Works, *City of Anderson*
1887 Howard St., Anderson, CA 96007
Phone: (530) 378-6640
awhelen@ci.anderson.ca.us

R. Matthew Wise, Supervising Deputy Attorney General, *Department of Justice*
Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255,
Sacramento, CA 94244-2550
Phone: (916) 210-6046
Matthew.Wise@doj.ca.gov

Yuri Won, Attorney, Office of Chief Counsel, *State Water Resources Control Board*
San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd
Floor, Sacramento, CA 95814
Phone: (916) 327-4439
Yuri.Won@waterboards.ca.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

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

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

Siew-Chin Yeong, Director of Public Works, *City of Pleasanton*
3333 Busch Road, Pleasanton, CA 94566
Phone: (925) 931-5506
syeong@cityofpleasantonca.gov

Stephanie Yu, Assistant Chief Counsel, *State Water Resources Control Board*
Office of Chief Counsel, 1001 I Street, Sacramento, CA 95814
Phone: (916) 341-5157
stephanie.yu@waterboards.ca.gov

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