



City of Sierra Madre

232 W. Sierra Madre Boulevard, Sierra Madre, CA 91024
phone 626.355.7135 fax 626.355.2251

RECEIVED
January 29, 2018
**Commission on
State Mandates**

January 26, 2018

Commission on State Mandates
980 9th Street, Suite 300
Sacramento, California 95814

RE: Comment in Support of Test Claims 13-TC-02 & 13-TC-01

Dear Commissioners:

INTRODUCTION

We submit this comment in support of 13-TC-02, the joint test claim filed by the County of Los Angeles (“County”) and the Los Angeles County Flood Control District (“District”) on July 10, 2014, and 13-TC-01, a similar claim by several cities in Los Angeles combined by the Commission under the designation: *California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175* (“Test Claims”). The Test Claims request reimbursement for costs associated with permits issued to the County, the District, and 84 cities by the California Regional Water Quality Control Board, Los Angeles Region (“Los Angeles Board”) on November 8, 2012 (individually, the “Permit,” and collectively, the “Permits”).

The Permits regulate the discharges from the municipal separate storm sewer systems operated, in part, by cities like Sierra Madre. Under the Permits, individual cities are forced to undertake costly structural best management practices without any additional State or Federal funding and without the ability to raise revenue through fees or assessments. Sierra Madre alone expects to spend \$23,152,349 on its Permit’s requirements, more than twice the City’s annual budget.

Consistent with recent appellate decisions, the Permits’ requirements are compensable state mandates. Many of the requirements imposed by the Los Angeles Board are discretionary. The Los Angeles Board has not made an express finding that these requirements are the only means of meeting the standards under the federal Clean Water Act (“CWA”). The State must assist local agencies in achieving the costly environmental benchmarks it imposed.

THE COUNTY AND DISTRICT’S TEST CLAIM

The Test Claims are made under article XIII B, section 6, of the California Constitution, which requires a subvention of funds whenever the Legislature or any state agency imposes a new program or higher level of service on any local government. The Permit requirements at issue here are “programs” within the meaning of section 6, in that they require the County, the District, and the City to provide certain services to the public. As noted in the Test Claims, the Permits requirements mandate new programs or higher levels of service related to the (1) monitoring of compliance with Total Maximum Daily Loads (“TMDL”), (2) the prohibition on non-stormwater discharges to the storm sewer systems, and (3) public agency requirements.

The Test Claims indicate the County and District together incurred Permit-related expenses of \$3,212,000 in Fiscal Year 2012–2013 and \$10,692,000 in Fiscal Year 2013–2014, and expect to incur tens of millions of dollars in compliance costs in the coming years. Sierra Madre is only one of the permittees, and cannot speak to the cost estimates provided by the Cities, County, or District. However, their estimates are reasonable

given the expenses the City expects to incur as a member of the Rio Hondo / San Gabriel River Water Quality Group (“Group”) and individually.

COSTS BORNE BY SIERRA MADRE UNDER THE PERMIT

As a member of the Group, Sierra Madre participated in crafting the Rio Hondo / San Gabriel River Water Quality Group Enhanced Watershed Management Plan (“EWMP”), outlining a program for meeting the applicable numeric effluent limitations and other requirements of the Permit. The EWMP was prepared at a cost of approximately \$1,710,537. Sierra Madre contributed \$53,367.38. The overall cost estimate of the EWMP programs is \$1,417,717,256 to be incurred over approximately the next 11 years, but this amount does not include ongoing operation and maintenance costs beyond that time period. The cost to the City, individually, over the same 11 year period is estimated to be \$23,152,349, more than twice the City’s annual budget.

The EWMP describes two main categories of what are known as structural “best management practices” (“BMPs”), namely “Regional BMPs” and “Distributed BMPs.” Regional BMPs are defined as constructed structural practices intended to treat run-off from a contributing area of multiple parcels, and include like filtration basins, detention basins, constructed wetlands, and treatment facilities. Under the Permit, Sierra Madre will participate in the construction of a large diversion structure to divert runoff approximately 1,700 feet to utilize existing spreading ground area at an estimated cost of \$4,818,000.

Distributed BMPs are defined as constructed structural practices to treat run-off relatively close to the source and typically implemented at a single- or few- parcel level. Distributed BMPs include “Green Streets” — a term which generally connotes reconstructed public streets, often involving the installation of an aggregate of bioretention, biofiltration and/or permeable pavement. Under the Permit, Sierra Madre is required to build approximately 6 miles of Green Streets throughout the watershed area. To meet its obligation, the City has adopted a Green Streets policy, as well as a Low Impact Development Ordinance to require all street and road construction of 10,000 square feet or more of surface area to comply with that policy.

FUNDS AVAILABLE TO SIERRA MADRE

It is unclear how the City will continue to fund its traditional services while implementing these extremely costly BMP programs. The City’s general fund revenues are already budgeted for many critical public services such as police, fire and other emergency services, along with the maintenance of public parks, public libraries, public streets, etc. The City is currently evaluating the matter and has yet to identify how it will be able to obtain the necessary funds needed to fully implement its obligations under the EWMP to remain in compliance with the Permit.

Sierra Madre is not aware of any designated Federal, State, or non-local agency funds that are or will be available to fund the mandated activities set forth above. The City is also restricted by the California Constitution with respect to its ability to assess fees or assessments sufficient to pay for the Permit’s mandates because any assessment or fee to pay for compliance with these obligations would potentially be considered a “special tax,” which may not be imposed without a two-thirds vote of the electorate.

THE PERMITS REQUIREMENTS ARE STATE MANDATES UNDER CASE LAW

I. DOF I

The Permit’s conditions imposed on the County, the District, and the City are compensable state mandates under the California Supreme Court’s opinion in *Department of Finance v. Commission on State Mandates* (2016) 1 Cal.5th 749 (“*DOF I*”). In *DOF I*, the Court evaluated conditions contained in permits issued by the Los Angeles Board in 2001 (“2001 Permits”). The 2001 Permits’ conditions required local agencies to conduct inspections of certain facilities and construct sites and to install and maintain trash receptacles. The court held:

It is clear federal law did not compel the Regional Board to impose these particular requirements. There was no evidence the state was compelled to administer its own permitting

system rather than allowing the EPA do so under the CWA. (33 U.S.C. § 1342(a).) In this respect, the case is similar to *Division of Occupational Safety*, *supra*, 189 Cal.App.3d 794, 234 Cal.Rptr. 661. Here, as in that case, the state chose to administer its own program, finding it was “in the interest of the people of the state, *in order to avoid direct regulation by the federal government of persons already subject to regulation*” under state law. (Wat. Code, § 13370, subd. (c), italics added.) Moreover, the Regional Board was not required by federal law to impose any specific permit conditions. The federal CWA broadly directed the board to issue permits with conditions designed to reduce pollutant discharges to the maximum extent practicable. But the EPA’s regulations gave the board discretion to determine which specific controls were necessary to meet that standard. (40 C.F.R. § 122.26(d)(2)(iv).)

(*DOF I*, *supra*, 1 Cal.5th at p. 767.) The same is true here for the 2012 Permits at issue, itself a significant expansion of the 2001 Permits at issue in *DOF I*.

Like the inspection and trash receptacle requirements of the 2001 Permits, the 2012 Permits are discretionary. The TMDL monitoring and compliance requirement applied to the individual permittees, the non-stormwater discharge prohibition, and the expansive public agency requirements are not mandated by the CWA. The burden to prove that a regulatory requirement under the CWA is federally mandated, and excepted from reimbursement, rests with the state. (*DOF I*, *supra*, 1 Cal.5th at p. 769.) Here, as in *DOF I*, the state failed to overcome its burden in adopting and defending the Permit. (*Id.* at p. 770–772.) Critically, the Regional Board, in issuing, and the State Board, in approving and upholding the Permit after appeal by Sierra Madre and other permittees, both failed to demonstrate that the Permit’s requirements do not exceed the CWA standard requiring permittees to apply best management practices to reduce impacts to protected waters to the maximum extent practicable. (42 U.S.C. § 402(p)(3)(B)(iii).) Instead, Sierra Madre contends, together with the Test Claims, that the Permit’s requirements exceed this federally mandated compliance level and thus constitute unfunded state mandates.

II. *DOF II*

A similar outcome was reached in a recent decision of the Third District Court of Appeal in *Department of Finance v. Commission on State Mandates* (Dec. 19, 2017, Case No. C070357) ___ Cal.Rptr.3d ___ (2017 WL 6461994) (“*DOF IP*”). The case involves a test claim filed by a number of cities in San Diego County (“San Diego Cities”) with the Commission challenging the municipal separate storm sewer systems permits issued in 2007 (“2007 Permits”) by the San Diego Regional Water Quality Control Board (“San Diego Board”).

In *DOF II*, the Commission evaluated the San Diego Cities’ test claim, finding the 2007 Permits were a state mandate, and the cost of compliance with its conditions must be reimbursed by the State.¹ The San Diego Board filed a writ to have a judge review the Commission’s decision. The lower court reversed the Commission’s decision, holding the Commission failed “to determine whether any of the permit requirements exceeded the ‘maximum extent practicable’ standard imposed by the [CWA].”² The San Diego Cities appealed. While the appeal was pending, the California Supreme Court issued its opinion in *DOF I*.

The court of appeal reversed the lower court, holding the 2007 Permits’ conditions imposed a state mandate and the costs associated with the 2007 Permits is reimbursable. In reaching its conclusion, the court of appeal in *DOF II* relied on the test articulated by the California Supreme Court in *DOF I*: “If federal law compels the state to impose, or itself imposes, a requirement, that requirement is a federal mandate. On the other hand, if federal law gives the state discretion whether to impose a particular implementing requirement, and the state exercises its discretion to impose the requirement by virtue of a ‘true choice,’ the requirement is not federally

¹ (Slip Op. at p. 6.)

² (*Ibid.*)

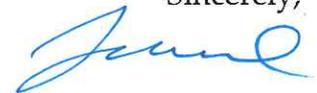
mandated.”³ The court asserted the San Diego Board was vested “with discretion to choose how the permittees must meet the standard, and the exercise of that discretion resulted in imposing a state mandate.”⁴ The court held the federal mandate exception to the reimbursement requirement did not apply.⁵ For the exception to apply, the San Diego Board must have made an express finding that “the conditions are the only means by which the ‘maximum extent practicable’ standard can be met.”⁶ Although the San Diego Board found the 2007 Permits’ requirements were “necessary” to meet the standard, “use of the word ‘necessary’ did not equate to finding the permit requirement was the *only* means of meeting the standard.”⁷ The Court thus concluded that the permit’s requirements constituted reimbursable state mandates, not minimum federal mandates.

The Los Angeles Board and the State Board, on appeal, did not find the Permit requirements are “the *only* means of meeting the standard.” For example, the City’s obligation to construct a large diversion structure to divert runoff under its Regional BMP or to build approximately 6 miles of Green Streets under its Distributed BMP are one of many ways in which the City could have met the CWA standard, but was forced to take these steps by the terms of the Permit, expressly requiring Green Streets and effectively requiring the development of a regional diversion/clean up structure via the Enhanced Watershed Management Programs. These specific methods are not federally mandated, and are thus discretionary state mandates subject to compensation by this Commission.

CONCLUSION

In sum, the City of Sierra Madre comments in support of Test Claims 13-TC-02 and 13-TC-01. Sierra Madre, like many other local agencies, is required under State law to undertake new, expensive, and onerous programs as part of its EWMP to remain in compliance with its Permit. Under article XIII B, section 6, of the California Constitution, the Commission on State Mandates must find that these programs are discretionary and compensable, and require the State to reimburse the County, District, and all other local jurisdictions for the cost of these new programs.

Sincerely,



James Carlson
Management Analyst

³ (Slip Op. at p. 8, quoting *DOF I* at p. 765.)

⁴ (Slip Op. at p. 7.)

⁵ (Slip Op. at p. 11.)

⁶ (*Ibid.*)

⁷ (*Ibid.*, emphasis in original)

1 DECLARATION OF JAMES CARLSON

2 I, James Carlson, declare as follows:

3 1. I am currently employed by the City of Sierra Madre ("City") as the City's
4 Management Analyst. Among my various responsibilities, I am responsible for assisting the City
5 in overseeing implementation of the City's storm water management programs, including assisting
6 in the development and implementation of various programs required under the Municipal
7 National Pollutant Discharge Elimination System ("NPDES") permit issued by the Los Angeles
8 Regional Water Quality Control Board ("LA Regional Board") by Order No. R4-2012-0175,
9 NPDES Permit No. CAS004001, entitled "Waste Discharge Requirements for Municipal Separate
10 Storm Sewer System ("MS4") discharges within the coastal watersheds of Los Angeles County,
11 except those discharges originating from the City of Long Beach MS4" (hereafter "Permit").

12 2. The City has a population of approximately 11,000 residents. For the 2016-2017
13 fiscal year, pursuant to its approved budget, the City's total annual estimated general fund
14 revenues were \$10.8 million. The City's total estimated general fund expenditures for this same
15 2016-2017 fiscal year were \$10.8 million.

16 3. To do its best to remain in compliance with the applicable numeric effluent
17 limitations ("NELs") required under the Permit, and the non-stormwater discharge prohibition
18 requirement in the Permit, the City has participated in the preparation and timely submittal of what
19 is termed in the Permit as an "Enhanced Watershed Management Plan, also known as an EWMP"
20 (the "Program").

21 4. The Program the City is participating in is known as the "Rio Hondo/San Gabriel
22 River Water Quality Group Enhanced Watershed Management Program." This Program was
23 prepared at a cost of approximately \$790,537.00 of which the City of Sierra Madre contributed
24 \$53,367.38.

25 5. The City's Program was approved by the Regional Board on or about April 21,
26 2016. The overall cost estimate for the implementation of the City's Program by all participating
27 Permittees is \$1,417,717,256 to be incurred over approximately the next 11 years, but this amount
28

1 does not include ongoing operation and maintenance costs beyond that time period.

2 6. I have also calculated out the total cost based on the estimates provided in the
3 Program, for the City to implement its portion of the Program over the next 11 years. This
4 estimated amount is \$23,152,349, but it does not include ongoing operation and maintenance costs
5 that will be incurred by the City beyond that time period.

6 7. The City's Program, as do many of the WMPs/EWMPs, describes two main
7 categories of what are known as structural "best management practices" ("BMPs"), namely
8 "Regional BMPs" and "Distributed BMPs". These structural BMPs must be designed and
9 implemented to provide "reasonable assurances" that the numerous applicable numeric effluent
10 limitations ("NELs") required in the Permit, are all achieved.

11 8. Regional BMPs are commonly defined as "constructed structural practices intended
12 to treat run-off from a contributing area of multiple parcels (normally on the order of 10s or 100s
13 of acres or larger)." Regional BMPs typically include large structural BMPs, including large
14 infiltration basins, detention basins, constructed wetlands and treatment facilities.

15 9. "Distributed BMPs," are typically defined as "constructed structural practices
16 intended to treat run-off relatively close to the source and typically implemented at a single- or
17 few- parcel level (normally less than one acre)." Distributed BMPs include those BMPs used in
18 connection with the construction and implementation of what are known as "Green Streets" – a
19 term which generally connotes reconstructed public streets, often involving the installation of an
20 aggregate of bioretention, biofiltration and/or permeable pavement BMPs. Distributed BMPs
21 would include detention basins, wet detention ponds, detention chambers, bioretention and
22 biofiltration, infiltration BMPs (such as non-vegetated infiltrated trenches, dry wells and rock
23 wells), as well as permeable pavement (used in Green Streets)and rain harvest BMPs (e.g., green
24 roofs, cisterns and rain barrels).

25 10. The City's Program calls for the development of approximately a total of 6 miles of
26 Green Streets throughout the watershed area, with 6 miles estimated to be needed to be
27 constructed within the City. To attempt to meet this obligation, the City has adopted a Green
28

1 Streets Policy, as well as a Low Impact Development (“LID”) Ordinance to require all street and
2 road construction of 10,000 square feet or more of surface area to comply with that policy.

3 11. An example of a Regional BMP project proposed with the Program involves the
4 construction of a large diversion structure to divert runoff approximately 1,700 feet to utilize
5 existing spreading ground areas at an estimated cost of \$4,818,000. This Regional BMP is to be
6 designed to detain up to 2.5 million gallons of runoff, from approximately 120 acres of upgradient
7 drainage area, and is proposed to be fully constructed and operational by 2020.

8 12. In addition to developing and implementing the Regional BMPs and Distributed
9 BMPs, the City must continue to provide those basic public services every municipality is
10 obligated to provide to its citizens. However, how the City will be able to continue to fund its
11 traditional services, while at the same time implementing these extremely costly BMP programs,
12 is unknown. The City’s general fund revenues are already budgeted for many critical public
13 services such as police, fire and other emergency services, along with the maintenance of public
14 parks, public libraries, and public streets, etc., and other necessary municipal services. The City is
15 currently unaware of how it will be able to obtain the necessary funds needed to fully implement
16 its obligations under the Program in order to stay in compliance with the Permit’s NELs.

17
18 I declare under the penalty of perjury that the foregoing is true and correct of my own
19 personal knowledge, and if called upon as a witness I could and would competently testify thereto
20 under oath.

21 Executed this 26th day of January, 2018, in the City of Sierra Madre, County of Los
22 Angeles, State of California.

23
24 
James Carlson

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 January 31, 2018, I served the:

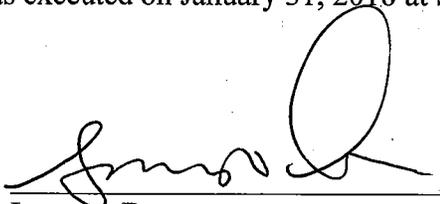
- **Interested Party's (City of Sierra Madre) Comments on the Test Claim filed January 29, 2018**

California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175, 13-TC-01 and 13-TC-02

Cities of Agoura Hills, Bellflower, Beverly Hills, Carson, Cerritos, Commerce, Downey, Huntington Park, Lakewood, Manhattan Beach, Norwalk, Pico Rivera, Rancho Palos Verdes, Redondo Beach, San Marino, Santa Clarita, Santa Fe Springs, Signal Hill, South El Monte, Vernon, Westlake Village, and Whittier, County of Los Angeles, and Los Angeles 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 January 31, 2018 at Sacramento, California.



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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 12/21/17

Claim Number: 13-TC-01 and 13-TC-02

Matter: California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175

Claimants: City of Agoura Hills
City of Bellflower
City of Beverly Hills
City of Carson
City of Cerritos
City of Commerce
City of Downey
City of Huntington Park
City of Lakewood
City of Manhattan Beach
City of Norwalk
City of Pico Rivera
City of Rancho Palos Verdes
City of Redondo Beach
City of San Marino
City of Santa Clarita
City of Santa Fe Springs
City of Signal Hill
City of South El Monte
City of Vernon
City of Westlake Village
City of Whittier
County of Los Angeles
Los Angeles 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.)

Mahdi Aluzri, City Manager, *City of Beverly Hills*
455 North Rexford Drive, Beverly Hills, CA 90210
Phone: (310) 285-1014
maluzri@beverlyhills.org

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

Maryam Babaki, Director of Public Works and Development Services, City of Commerce

2535 Commerce Way, Commerce, CA 90040

Phone: (323) 722-4805

mbabaki@ci.commerce.ca.us

Harmeet Barkschat, Mandate Resource Services, LLC

5325 Elkhorn Blvd. #307, Sacramento, CA 95842

Phone: (916) 727-1350

harmeet@calsdrc.com

Lacey Baysinger, State Controller's Office

Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 324-0254

lbaysinger@sco.ca.gov

Cindy Black, City Clerk, City of St. Helena

1480 Main Street, St. Helena, CA 94574

Phone: (707) 968-2742

cityclerk@cityofstheleena.org

Rene Bobadilla, City Manager, City of Pico Rivera

Administration, 6615 Passons Boulevard, Pico Rivera, CA 90660

Phone: (562) 801-4368

rbobadilla@pico-rivera.org

Allan Burdick,

7525 Myrtle Vista Avenue, Sacramento, CA 95831

Phone: (916) 203-3608

allanburdick@gmail.com

J. Bradley Burgess, MGT of America

895 La Sierra Drive, Sacramento, CA 95864

Phone: (916) 595-2646

Bburgess@mgtamer.com

Ben Cardenas, Assistant City Manager, City of Pico Rivera

6615 Passons Blvd, Pico Rivera, CA 90660

Phone: (562) 801-4379

bcardenas@pico-rivera.org

Gwendolyn Carlos, State Controller's Office

Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 323-0706

gcarlos@sco.ca.gov

Daniel Carrigg, Deputy Executive Director/Legislative Director, League of California Cities

1400 K Street, Suite 400, Sacramento, CA 95814

Phone: (916) 658-8222

Dcarrigg@cacities.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, *Legal Analyst's Office*
925 L Street, 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

Jeffrey W. Collier, City Manager, *City of Whittier*
13230 Penn Street, Whittier, CA 90602
Phone: (562) 567-9301
jcollier@cityofwhittier.org

Cindy Collins, Interim City Manager, *City of San Marino*
2200 Huntington Drive, San Marino, CA 91108
Phone: (626) 300-0700
ccollins@cityofsanmarino.org

Anita Dagan, Manager, Local Reimbursement Section, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 324-4112
Adagan@sco.ca.gov

Mark Danaj, City Manager, *City of Manhattan Beach*
1400 Highland Ave, Manhattan Beach, CA 90266
Phone: (310) 802-5302
mdanaj@citymb.info

Marieta Delfin, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-4320
mdelfin@sco.ca.gov

Carlos Fandino, Jr., City Administrator, *City of Vernon*
4305 Santa Fe Avenue, Vernon, CA 90058
Phone: (323) 583-8811
cfandino@ci.vernon.ca.us

Ken Farfsing, City Manager, *City of Carson*
701 E. Carson Street, Carson, CA 90745
Phone: (310) 952-1700
kfarfsing@carson.ca.us

Donna Ferebee, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-3274
donna.ferebee@dof.ca.gov

Jennifer Fordyce, *State Water Resources Control Board*
Los Angeles Regional Water Quality Control Board, 1001 I Street, 22nd floor, Sacramento, CA
95814

Phone: (916) 324-6682
jfordyce@waterboards.ca.gov

Siobhan Foster, Director of Public Works, *City of Covina*
125 E College Street, Covina, CA 91723
Phone: (626) 384-5484
sfoster@covinaca.gov

Sophie Froelich, Attorney III, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95812
Phone: (916) 319-8557
Sophie.Froelich@waterboards.ca.gov

Art Gallucci, City Manager, *City of Cerritos*
18125 Bloomfield Ave, Cerritos, CA 90703
Phone: (562) 916-1310
agallucci@cerritos.us

Susan Geanacou, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-3274
susan.geanacou@dof.ca.gov

Angela George, Principal Engineer, Watershed Management Division, *County of Los Angeles*
Department of Public Works, 900 South Fremont Avenue, Alhambra, CA 91803
Phone: (626) 458-4325
ageorge@dpw.lacounty.gov

Howard Gest, *Burhenn & Gest, LLP*
Claimant Representative
624 South Grand Avenue, Suite 2200, Los Angeles, CA 90402
Phone: (213) 629-8787
hgest@burhenngest.com

Dillon Gibbons, Legislative Representative, *California Special Districts Association*
1112 I Street Bridge, Suite 200, Sacramento, CA 95814
Phone: (916) 442-7887
dillong@csga.net

Julio Gonzalez, Acting Water Program Manager, *City of Carson*
701 E. Carson Street, Carson, CA 90745
Phone: (310) 352-1700
jgonzale@carson.ca.us

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

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

Sunny Han, Project Manager, *City of Huntington Beach*
2000 Main Street, Huntington Beach, CA 92648

Phone: (714) 536-5907
Sunny.han@surfcity-hb.org

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

Joe Hoefgen, Interim City Manager, *City of Redondo Beach*
415 Diamond Street, Redondo Beach, CA 90277
Phone: (310) 372-1171
joe.hoefgen@redondo.org

Charles Honeycutt, City Manager, *City of Signal Hill*
2175 Cherry Avenue, Signal Hill, CA 90755
Phone: (562) 989-7302
choneycutt@cityofsignalhill.org

Justyn Howard, Program Budget Manager, *Department of Finance*
915 L Street, Sacramento, CA 95814
Phone: (916) 445-1546
justyn.howard@dof.ca.gov

Edward Jewik, *County of Los Angeles*
Auditor-Controller's Office, 500 W. Temple Street, Room 603, Los Angeles, CA 90012
Phone: (213) 974-8564
ejewik@auditor.lacounty.gov

Dorothy Johnson, Legislative Representative, *California State Association of Counties*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
djohnson@counties.org

Jill Kanemasu, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-9891
jkanemasu@sco.ca.gov

Anita Kerezsi, *AK & Company*
3531 Kersey Lane, Sacramento, CA 95864
Phone: (916) 972-1666
akcompanysb90@gmail.com

Nicole Kuenzi, *State Water Resources Control Board*
1001 I Street, Sacramento, Calif
Phone: (916) 341-5199
nicole.kuenzi@waterboards.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

Gilbert A. Livas, City Manager, *City of Downey*
11111 Brookshire Ave, Downey, CA 90241-7016
Phone: (562) 904-7102
glivas@downeyca.org

Hortensia Mato, *City of Newport Beach*

100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3000
hmato@newportbeachca.gov

Thaddeus McCormack, City Manager, *City of Lakewood*
5050 Clark Avenue, Lakewood, CA 90712
Phone: (562) 866-9771
tmack@lakewoodcity.org

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

Meredith Miller, Director of SB90 Services, *MAXIMUS*
3130 Kilgore Road, Suite 400, Rancho Cordova, CA 95670
Phone: (972) 490-9990
meredithcmiller@maximus.com

Mohammad Mostahkami, Director of Public Works, *City of Downey*
11111 Brookshire, Downey, CA 90241-7016
Phone: (562) 904-7102
mmostahkami@downeyca.org

John Naimo, Acting Auditor-Controller, *County of Los Angeles*
Auditor-Controller, 500 West Temple Street, Room 525, Los Angeles, CA 90012
Phone: (213) 974-8302
jnaimo@auditor.lacounty.gov

Noe Negrete, Director of Public Works, *City of Santa Fe Springs*
11710 E. Telegraph Rd, Santa Fe Springs, CA 90670
Phone: (562) 868-0511
noenegrete@santafesprings.org

Geoffrey Neill, Senior Legislative Analyst, Revenue & Taxation, *California State Association of Counties (CSAC)*
1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
gneill@counties.org

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*
P.O. Box 100, Sacramento, CA 95812
Phone: (916) 322-3313
Adriana.nunez@waterboards.ca.gov

Lori Okun, Assistant Chief Counsel, *State Water Resources Control Board*
Regional Water Board Legal Services, 1001 I Street, Sacramento, CA 95814
Phone: (916) 341-5165
Lori.Okun@waterboards.ca.gov

Arthur Palkowitz, *Artiano Shinoff*
2488 Historic Decatur Road, Suite 200, San Diego, CA 92106

Phone: (619) 232-3122
apalkowitz@as7law.com

James Parker, Interim City Manager, *City of Norwalk*
12700 Norwalk Boulevard, Norwalk, CA 90650
Phone: (562) 929-5772
jparker@norwalkca.gov

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

Mark Pestrella, Chief Engineer, *Los Angeles County Flood Control District*
900 South Fremont Avenue, Alhambra, CA 91803
Phone: (626) 458-4001
mpestrella@dpw.lacounty.gov

Don Powell, City Manager, *City of Santa Fe Springs*
11710 E. Telegraph Road, Santa Fe Springs, CA 90670
Phone: (562) 409-7510
donpowell@santafesprings.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@atc.sbcounty.gov

Renee Purdy, *Los Angeles Regional Water Quality Control Board*
320 West 4th Street, Suite 200, Los Angeles, CA 90013-2343
Phone: (213) 576-6686
rpurdy@waterboards.ca.gov

Gregory Ramirez, City Manager, *City of Agoura Hills*
30001 Ladyface Court, Agoura Hills, CA 91301
Phone: (818) 597-7311
gramirez@ci.agoura-hills.ca.us

Lisa Rapp, Public Works Director, *City of Lakewood*
5050 Clark Avenue, Lakewood, CA 90712
Phone: (562) 866-9771
lrapp@lakewoodcity.org

Mark Rewolinski, *MAXIMUS*
808 Moorefield Park Drive, Suite 205, Richmond, VA 23236
Phone: (949) 440-0845
markrewolinski@maximus.com

Ricardo Reyes, Interim City Manager, *City of Huntington Park*
6550 Miles Ave, Huntington Park, CA 90255
Phone: (323) 584-6223
rreyes@hpca.gov

David Rice, *State Water Resources Control Board*
1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 341-5161
davidrice@waterboards.ca.gov

Ivar Ridgeway, *Los Angeles Regional Water Quality Control Board*

320 West 4th Street, Suite 200, Los Angeles, CA 90013-2343

Phone: (213) 576-6686

iridgeway@waterboards.ca.gov

Matthew Rodriguez, Interim City Administrator, *City of Commerce*

2535 Commerce Way, Commerce, CA 90040

Phone: (323) 722-4805

mrodriguez@ci.commerce.ca.us

Carla Shelton, *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

Jason Sisney, Chief Deputy Legislative Analyst, *Legislative Analyst's Office*

925 L Street, Sacramento, CA 95814

Phone: (916) 319-8631

Jason.Sisney@LAO.ca.gov

Deborah Smith, *Los Angeles Regional Water Quality Control Board*

320 West 4th Street, Suite 200, Los Angeles, CA

Phone: (213) 576-6609

dsmith@waterboards.ca.gov

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

Jim Spano, Chief, Mandated Cost Audits Bureau, *State Controller's Office*

Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 323-5849

jspano@sco.ca.gov

Dennis Speciale, *State Controller's Office*

Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 324-0254

DSpeciale@sco.ca.gov

Joe Stephenshaw, Director, *Senate Budget & Fiscal Review Committee*

California State Senate, State Capitol Room 5019, Sacramento, CA 95814

Phone: (916) 651-4103

Joe.Stephenshaw@sen.ca.gov

Jeffrey L. Stewart, City Manager, *City of Bellflower*

16600 Civic Center Drive, Bellflower, CA 90706

Phone: (562) 804-1424

jstewart@bellflower.org

Ken Striplin, City Manager, *City of Santa Clarita*

23920 Valencia Blvd, Santa Clarita, CA 91355

Phone: (661) 259-2489

hmerenda@santa-clarita.com

Tracy Sullivan, Legislative Analyst, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 650-8124
tsullivan@counties.org

Matthew Summers, Senior Counsel, *Colantuono, Highsmith & Whatley, PC*
300 South Grand Avenue, Suite 2700, Los Angeles, CA 90071
Phone: (213) 542-5700
msummers@chwlaw.us

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

Ray Taylor, City Manager, *City of Westlake Village*
31200 Oakcrest Drive, Westlake Village, CA 91361
Phone: (818) 706-1613
Ray@wlv.org

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

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

Kelli Tunncliff, Director of Public Works, *City of Signal Hill*
2175 Cherry Avenue, Signal Hill, CA 90755
Phone: (562) 989-7356
ktunncliff@cityofsignalhill.org

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

Samuel Unger, *Los Angeles Regional Water Quality Control Board*
320 West 4th Street, Suite 200, Los Angeles, CA 90013-2343
Phone: (213) 576-6605
sunger@waterboards.ca.gov

Daniel Wall, Director of Public Works, Water & Development Services, *City of Vernon*
4305 Santa Fe Avenue, Vernon, CA 90058
Phone: (323) 583-8811
dwall@ci.vernon.ca.us

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

Jennifer Whiting, Assistant Legislative Director, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814

Phone: (916) 658-8249
jwhiting@cacities.org

Patrick Whitnell, General Counsel, *League of California Cities*
1400 K Street, Suite 400, Sacramento, CA 95814
Phone: (916) 658-8281
pwhitnell@cacities.org

Doug Willmore, City Manager, *City of Rancho Palos Verdes*
30940 Hawthorne Blvd, Rancho Palos Verdes, CA 90275
Phone: (310) 544-5202
dwillmore@rpvca.gov

Hasmik Yaghobyan, *County of Los Angeles*
Auditor-Controller's Office, 500 W. Temple Street, Room 603, Los Angeles, CA 90012
Phone: (213) 974-9653
hyaghobyan@auditor.lacounty.gov

Anthony R. Ybarra, City Manager, *City of South El Monte*
1415 Santa Anita Ave, South El Monte, CA 91733
Phone: (626) 579-6540
tybarra@soelmonte.org