

February 18, 2026

Mr. Howard Gest
Burhenn & Gest, LLP
12401 Wilshire Blvd, Suite 200
Los Angeles, CA 90025

Ms. Anne Kato
State Controller's Office
Local Government Programs and Services
Division
3301 C Street, Suite 740
Sacramento, CA 95816

And Parties, Interested Parties, and Interested Persons (See Mailing List)

Re: Decision and Parameters and Guidelines

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

County of Los Angeles; Los Angeles County Flood Control District; and the Cities of Agoura Hills, Bellflower, Beverly Hills, Carson, Cerritos, Commerce, Downey, Huntington Park, Lakewood, Manhattan Beach, Norwalk, Pico Rivera, Rancho Palos Verdes, Redondo Beach, Santa Fe Springs, Signal Hill, South El Monte, Vernon, Westlake Village, and Whittier, Claimants

Dear Mr. Gest and Ms. Kato:

On February 13, 2026, the Commission on State Mandates adopted the Decision and Parameters and Guidelines on the above-captioned matter.

Very truly yours,



Juliana F. Gmur,
Executive Director

BEFORE THE
COMMISSION ON STATE MANDATES
STATE OF CALIFORNIA

IN RE PARAMETERS AND GUIDELINES

California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175, Part VI.E.1.c. and Attachments M, O, P, and Q, (which incorporate by reference Part VI.E.3.)

Period of reimbursement from December 28, 2012, through December 31, 2017

Case Nos.: 13-TC-01; 13-TC-02

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

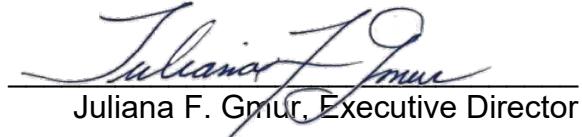
DECISION PURSUANT TO GOVERNMENT CODE SECTION 17500 ET SEQ.; CALIFORNIA CODE OF REGULATIONS, TITLE 2, DIVISION 2, CHAPTER 2.5, ARTICLE 7.

(Adopted February 13, 2026)

(Served February 18, 2026)

PARAMETERS AND GUIDELINES

The Commission on State Mandates adopted the attached Decision and Parameters and Guidelines on February 13, 2026.



Juliana F. Gmür, Executive Director

BEFORE THE
COMMISSION ON STATE MANDATES
STATE OF CALIFORNIA

IN RE PARAMETERS AND GUIDELINES	Case Nos.: 13-TC-01; 13-TC-02
California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175, Part VI.E.1.c. and Attachments M, O, P, and Q, (which incorporate by reference Part VI.E.3.)	<i>California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2012-0175</i>
Period of reimbursement from December 28, 2012, through December 31, 2017	DECISION PURSUANT TO GOVERNMENT CODE SECTION 17500 ET SEQ.; CALIFORNIA CODE OF REGULATIONS, TITLE 2, DIVISION 2, CHAPTER 2.5, ARTICLE 7. <i>(Adopted February 13, 2026)</i> <i>(Served February 18, 2026)</i>

DECISION

The Commission on State Mandates (Commission) heard and decided the Decision and Parameters and Guidelines during a regularly scheduled hearing on February 13, 2026. Howard Gest appeared on behalf of the claimants. Chris Hill and Kaily Yap appeared on behalf of the Department of Finance.

The law applicable to the Commission's determination of a reimbursable state-mandated program is article XIII B, section 6 of the California Constitution, Government Code sections 17500 et seq., and related case law.

The Commission adopted the Revised Proposed Decision and Parameters and Guidelines by a vote of 7-0, as follows:

Member	Vote
Lee Adams, County Supervisor	Yes
Deborah Gallegos, Representative of the State Controller	Yes
Karen Greene Ross, Public Member	Yes
Monica Jimenez, Representative of the State Treasurer, Vice Chairperson	Yes
Renee Nash, School District Board Member	Yes
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	Yes
Alexander Powell, Representative of the Director of the Office of Land Use and Climate Innovation	Yes

I. Summary of the Mandate

These Parameters and Guidelines address state-mandated activities arising from National Pollutant Discharge Elimination System Program (NPDES) permit, Order No. R4-2012-0175 (test claim permit), adopted by the Los Angeles Water Quality Control Board (Regional Board) on November 8, 2012, and effective on December 28, 2012.

On December 5, 2025, and corrected on January 30, 2026, the Commission on State Mandates (Commission) adopted a Decision partially approving this Test Claim for reimbursement beginning December 28, 2012, and found that Part VI.E.1.c. and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3. of the test claim permit, impose a reimbursable state mandated program for the pro rata costs to develop and submit a WMP or EWMP for only the U.S. EPA-adopted TMDLs identified below and in accordance with Part VI.E.3. as follows:

- a. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall propose BMPs to achieve the WLAs contained in the applicable U.S. EPA-established TMDL, and a schedule for implementing the BMPs that is as short as possible, in a WMP or EWMP.
- b. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below may either individually submit a WMP or may jointly submit a WMP or EWMP with other Permittees subject to the WLAs contained in the U.S. EPA-established TMDL.
- c. At a minimum, each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall include the following information in its WMP or EWMP, relevant to each applicable U.S. EPA-established TMDL:
 - Available data demonstrating the current quality of the Permittee's MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;
 - A detailed description of BMPs that have been implemented, and/or are currently being implemented by the Permittee to achieve the WLA(s), if any;
 - A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLA(s);
 - A demonstration that the time schedule requested is as short as possible, taking into account the time since USEPA establishment of the TMDL, and technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLA(s); and
 - If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and numeric milestones and the date(s) for their achievement.

- d. Each Permittee subject to a WLA in a TMDL established by U.S. EPA-identified below shall submit a draft of a WMP or EWMP to the Regional Water Board Executive Officer for approval per the schedule Part VI.C.4.¹

These requirements apply only to the following U.S. EPA-adopted TMDLs:

- Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL (effective March 26, 2012 (Attachment O)).²
- Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachment O for the TMDLs Los Angeles River Watershed Management Area, which include the following: Lake Calabasas Nutrient; Echo Park Lake PCBs, Chlordane, and Dieldrin; and Legg Lake Nutrient Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, and Dieldrin; and Attachment P for the TMDLs in the San Gabriel River Watershed Management Area, which include the Puddingstone Reservoir Nutrient, Mercury, PCBs, Chlordane, Dieldrin, DDT TMDLs.).³
- Los Cerritos Channel Metals TMDL, effective March 17, 2010 (Attachment Q).⁴

¹ Exhibit A, Corrected Test Claim Decision, pages 275-276 citing to Exhibit A, Test Claim 13-TC-01, pages 742, 746-747, 1100, 1105, 1115, 1142, 1143-1154, 1155-1160, and 1161 (test claim permit, Parts VI.E.1.c., VI.E.3., and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3.).

² Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, page 1142. The following permittees are required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL: Los Angeles County Flood Control District and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).)

³ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, pages 1143-1154, 1155-1160, 1071 et seq.). The following permittees are required to comply with the Los Angeles Area Lakes TMDLs: Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madre, and South El Monte. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).)

The permittees in the San Gabriel River Management Area include the Cities of Azusa, Claremont, Irwindale, La Verne, Pomona, San Dimas, the County of Los Angeles, and Los Angeles County Flood Control District. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁴ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the Los Cerritos Channel Metals TMDL: Bellflower, Cerritos, Downey, Lakewood, County of Los Angeles, Los Angeles County Flood Control District, Paramount, and Signal Hill.

- San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P).⁵
- Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M).⁶

Reimbursement for these activities is denied beginning January 1, 2018, because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d) and, thus, there are no costs mandated by the state.

In addition, reimbursement for these mandated activities from any source, including but not limited to, state and federal funds, any service charge, fees, or assessments to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes that are used to pay for the mandated activities, shall be identified and deducted from any claim submitted for reimbursement.

All other sections, activities, and costs pled in the Test Claim are denied.

II. Procedural History

On December 5, 2025, the Commission adopted the Test Claim Decision.⁷ On December 10, 2025, Commission staff issued the Draft Expedited Parameters and Guidelines.⁸ On December 30, 2025, the claimants filed comments on the Draft

(Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).)

⁵ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL: Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, County of Los Angeles, and Los Angeles County Flood Control District, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier.

(Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁶ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1105. The following permittees are required to comply with the Malibu Creek Watershed Nutrients TMDL: Agoura Hills, Calabasas, and Hidden Hills, County of Los Angeles, Los Angeles County Flood Control District, Malibu, and Westlake Village. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K).)

⁷ Exhibit A, Corrected Test Claim Decision.

⁸ Exhibit B, Draft Expedited Parameters and Guidelines.

Expedited Parameters and Guidelines.⁹ On December 31, 2025, the State Controller's Office filed comments on the Draft Expedited Parameters and Guidelines, recommending clarifying changes.¹⁰ On January 7, 2026, Commission staff issued the Draft Proposed Decision and Parameters and Guidelines.¹¹ On January 29, 2026, the claimants filed late comments on the Draft Proposed Decision and Parameters and Guidelines to indicate that the City of Irwindale should be listed as a permittee mandated to comply with the U.S. EPA-adopted TMDL, San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007, in accordance with the test claim permit and requests that this inadvertent mistake be corrected.¹² On January 30, 2026, the Commission issued a Corrected Test Claim Decision to correct this error.¹³

III. Party Positions

A. Claimants' Position

The claimants filed comments on the Draft Expedited Parameters and Guidelines stating the following:

Page 3 of the Draft Ps and Gs includes the following paragraph:

"Reimbursement for these activities is denied beginning January 1, 2018, because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code Section 17556(d) and, thus, there are no costs mandated by the state."

Claimants do not concede that they have fee authority as set for in this paragraph, and request its deletion, but acknowledge that the test claim decision contains this finding.¹⁴

The claimants also recommend the addition of the following highlighted language to the offsetting revenue and reimbursement paragraph:

Claimants request that the Commission make clear that such offsetting revenues do not include proceeds of taxes, and therefore request that the Commission add to this section the bold, underlined wording:

⁹ Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines.

¹⁰ Exhibit D, Controller's Comments on the Draft Expedited Parameters and Guidelines.

¹¹ Exhibit E, Draft Proposed Decision and Parameters and Guidelines.

¹² Exhibit F, Claimants' Late Comments on the Draft Proposed Decision and Parameters and Guidelines.

¹³ Exhibit A, Corrected Test Claim Decision.

¹⁴ Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, pages 1-2.

"Offsetting revenue or reimbursement includes the following:

Revenue from the Los Angeles Flood Control Act, which authorizes the Flood Control District to impose a fee or charge, in compliance with article XIII D of the California Constitution, to pay the costs and expenses of carrying out projects and providing services to improve water quality and reduce stormwater and urban runoff pollution in the District, **but not proceeds of taxes.**"¹⁵

On January 29, 2026, the claimants filed late comments on the Draft Proposed Decision and Parameters and Guidelines to indicate that the City of Irwindale should be listed as a permittee mandated to comply with the U.S. EPA-adopted TMDL, San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007, in accordance with the test claim permit and requests that this inadvertent mistake be corrected.¹⁶

B. State Controller's Office

The State Controller's Office filed comments on December 31, 2025, recommending clarifying changes to Section II, Eligible Claimants, to specifically identify the eligible claimants to the mandated program, and to Section III, Reimbursement Period, to identify when the period of reimbursement ends.¹⁷

IV. Discussion

The Parameters and Guidelines contain the following information:

A. Eligible Claimants (Section II. of the Parameters and Guidelines)

Section II. of the Parameters and Guidelines identifies the eligible claimants as follows:

The cities, county, and special district required to comply with the U.S. EPA-adopted TMDLs listed below, which are subject to the taxing restrictions of articles XIII A and XIII C, and the spending limits of article XIII B, of the California Constitution, whose increased costs for this program are paid from proceeds of taxes, are eligible to claim reimbursement.

¹⁵ Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, page 2.

¹⁶ Exhibit F, Claimants' Late Comments on the Draft Proposed Decision and Parameters and Guidelines.

¹⁷ Exhibit D, Controller's Comments on the Draft Expedited Parameters and Guidelines. It should be noted that the Controller's comments identify the permit and permittees to a San Francisco Regional Water Quality Control Board, and not to the test claim permit at issue in this claim. Nevertheless, the comment is understood and clarifications are made herein.

- The following permittees required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL, effective March 26, 2012 (Attachment O to test claim permit):

Los Angeles County Flood Control District and the City of Signal Hill.¹⁸
- The following permittees required to comply with the Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachments O and P to the test claim permit for the TMDLs in the Los Angeles River Watershed Management Area and the TMDLs in the San Gabriel River Watershed Management Area:

The following permittees in the Los Angeles River Watershed Management Area (Attachment O to the test claim permit): Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madra, and South El Monte.¹⁹

The following permittees in the San Gabriel River Management Area (Attachment P to the test claim permit): Cities of Azusa, Claremont, Irwindale, La Verne, Pomona, and San Dimas; County of Los Angeles; and Los Angeles County Flood Control District.²⁰
- The following permittees required to comply with the Los Cerritos Channel Metals TMDL, effective March 17, 2010:

Cities of Bellflower, Cerritos, Downey, Lakewood, Paramount, and Signal Hill; County of Los Angeles; and Los Angeles County Flood Control District.²¹
- The following permittees required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P):

Cities of Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale,

¹⁸ Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).

¹⁹ Exhibit A, Corrected Test Claim Decision, pages 276-277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).

²⁰ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).

²¹ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).

La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier; County of Los Angeles; and Los Angeles County Flood Control District.²²

- The following permittees required to comply with the Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M):

Cities of Agoura Hills, Calabasas, Hidden Hills, Malibu, and Westlake Village; County of Los Angeles; and Los Angeles County Flood Control District.²³

B. Period of Reimbursement (Section III. of the Parameters and Guidelines)

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The claimant filed the test claim on June 14, 2014, establishing eligibility for reimbursement for the 2012-2013 fiscal year. However, the test claim permit has a later effective date and therefore the period of reimbursement for this program begins on the permit's effective date, December 28, 2012. Beginning January 1, 2018, there are no costs mandated by the state because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d). Therefore, costs incurred from December 28, 2012, through December 31, 2017, are eligible for reimbursement.

The claimants state they "do not concede that they have fee authority as set for in [the Parameters and Guidelines] and request [deletion of this language], but acknowledge that the test claim decision contains this finding."²⁴

The Commission denies the claimants' request. As indicated in the Corrected Test Claim Decision, the Commission found that reimbursement is denied beginning January 1, 2018, because the claimants have the authority to impose stormwater fees sufficient as a matter of law to cover the costs of the reimbursable activities pursuant to Government Code section 17556(d) and, thus, there are no costs mandated by the state beginning January 1, 2018.²⁵ The Parameters and Guidelines are required to be

²² Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).

²³ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K.).

²⁴ Exhibit C, Claimants' Comments on the Draft Expedited Parameters and Guidelines, pages 1-2.

²⁵ Exhibit A, Corrected Test Claim Decision, pages 262-263, citing Government Code sections 53750 and 53751 (Stats. 2017, ch. 536 (SB 231)); *Department of Finance v.*

consistent with the Commission's Corrected Test Claim Decision.²⁶ Thus, the period of reimbursement is from December 28, 2012, through December 31, 2017.

C. Reimbursable Activities (Section IV. of the Parameters and Guidelines)

The Commission partially approved the Test Claim, authorizing reimbursement for the following mandated activities from December 28, 2012, through December 31, 2017:

- The pro rata costs to develop and submit a WMP or EWMP for only the U.S. EPA-adopted TMDLs identified below and in accordance with Part VI.E.3. as follows:
 - a. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall propose BMPs to achieve the WLAs contained in the applicable U.S. EPA-established TMDL, and a schedule for implementing the BMPs that is as short as possible, in a WMP or EWMP.
 - b. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below may either individually submit a WMP or may jointly submit a WMP or EWMP with other Permittees subject to the WLAs contained in the U.S. EPA-established TMDL.
 - c. At a minimum, each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall include the following information in its WMP or EWMP, relevant to each applicable U.S. EPA-established TMDL:
 - Available data demonstrating the current quality of the Permittee's MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;
 - A detailed description of BMPs that have been implemented, and/or are currently being implemented by the Permittee to achieve the WLA(s), if any;
 - A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLA(s);
 - A demonstration that the time schedule requested is as short as possible, taking into account the time since USEPA establishment of the TMDL, and technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLA(s); and

Commission on State Mandates (2022) 85 Cal.App.5th 535, 579-581; *Paradise Irrigation District v. Commission on State Mandates* (2019) 33 Cal.App.5th 174, 194.

²⁶ Government Code section 17557.

- If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and numeric milestones and the date(s) for their achievement.
- d. Each Permittee subject to a WLA in a TMDL established by U.S. EPA-identified below shall submit a draft of a WMP or EWMP to the Regional Water Board Executive Officer for approval per the schedule Part VI.C.4.²⁷

These requirements apply only to the following U.S. EPA-adopted TMDLs:

- Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL (effective March 26, 2012 (Attachment O)).²⁸
- Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachment O for the TMDLs Los Angeles River Watershed Management Area, which include the following: Lake Calabasas Nutrient; Echo Park Lake PCBs, Chlordane, and Dieldrin; and Legg Lake Nutrient Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, and Dieldrin; and Attachment P for the TMDLs in the San Gabriel River Watershed Management Area, which include the Puddingstone Reservoir Nutrient, Mercury, PCBs, Chlordane, Dieldrin, DDT TMDLs.)²⁹

²⁷ Exhibit A, Corrected Test Claim Decision, pages 275-276 citing to Exhibit A, Test Claim 13-TC-01, pages 742, 746-747, 1100, 1105, 1115, 1142, 1143-1154, 1155-1160, and 1161 (test claim permit, Parts VI.E.1.c., VI.E.3., and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3.).

²⁸ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, page 1142. The following permittees are required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL: Los Angeles County Flood Control District and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).)

²⁹ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, pages 1143-1154, 1155-1160, 1071 et seq. The following permittees are required to comply with the Los Angeles Area Lakes TMDLs: Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madra, and South El Monte. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).)

The permittees in the San Gabriel River Management Area include the Cities of Azusa, Claremont, Irwindale, La Verne, Pomona, San Dimas, the County of Los Angeles, and Los Angeles County Flood Control District. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

- Los Cerritos Channel Metals TMDL, effective March 17, 2010 (Attachment Q).³⁰
- San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P).³¹
- Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M).³²

These activities are identified in the Parameters and Guidelines.

D. Claim Preparation and Submission (Section V. of the Parameters and Guidelines)

Section V. of the Parameters and Guidelines (Claim Preparation and Submission) identifies the direct costs that are eligible for reimbursement.

E. Offsetting Revenues and Reimbursements (Section VII. of the Parameters and Guidelines)

Section VII. of the Parameters and Guidelines governs offsetting revenues (i.e., funds that are not a claimant's proceeds of taxes), which are required to be identified and deducted from the costs claimed. Section VII. of the Parameters and Guidelines states the following:

³⁰ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the Los Cerritos Channel Metals TMDL: Bellflower, Cerritos, Downey, Lakewood, County of Los Angeles, Los Angeles County Flood Control District, Paramount, and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).)

³¹ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL: Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, County of Los Angeles, and Los Angeles County Flood Control District, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

³² Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1105. The following permittees are required to comply with the Malibu Creek Watershed Nutrients TMDL: Agoura Hills, Calabasas, and Hidden Hills, County of Los Angeles, Los Angeles County Flood Control District, Malibu, and Westlake Village. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K).)

Any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement. Such offsetting revenue or reimbursement includes the following:

- Revenue from the Los Angeles Flood Control Act, which authorizes the Flood Control District to impose a fee or charge, in compliance with article XIII D of the California Constitution, to pay the costs and expenses of carrying out projects and providing services to improve water quality and reduce stormwater and urban runoff pollution in the District.³³
- Revenues from property-related stormwater fees.

The claimants request that the first bullet be edited to add the following highlighted text:

Revenue from the Los Angeles Flood Control Act, which authorizes the Flood Control District to impose a fee or charge, in compliance with article XIII D of the California Constitution, to pay the costs and expenses of carrying out projects and providing services to improve water quality and reduce stormwater and urban runoff pollution in the District, **but not proceeds of taxes.**"

The Commission denies the claimants' request since the proposed language is duplicative and ambiguous. The language proceeding the bulleted language expressly says that "funds that are *not* the claimant's proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement. Such offsetting revenue or reimbursement includes," which is followed by the bulleted text. Thus, the language proposed is duplicative and not necessary.

In addition, the existing language is consistent with pages 241-242 of the Commission's Corrected Test Claim Decision, which found that reimbursement is not required to the extent the claimants receive fee revenues charged by the Los Angeles Flood Control District, which are not the claimants' proceeds of taxes, and apply those funds to the reimbursable activities as follows:

However, reimbursement is not required to the extent the claimants receive fee revenue and used that revenue to pay for the state-mandated activities, or used any other revenues, including but not limited to grant funding, assessment revenue, and federal funds, that are *not* the claimants' proceeds of taxes. When state-mandated activities do not

³³ Water Code Appendix, section 28-2 (Stats. 2010, ch. 602 (AB 2554, sections 8a and 8b)).

compel the increased expenditure of local “proceeds of taxes,” reimbursement under section 6 is not required.³⁴

In this respect, the Legislature amended the Los Angeles Flood Control Act in Assembly Bill 2554 to authorize the Flood Control District to impose a fee or charge, in compliance with article XIII D of the California Constitution, to pay the costs and expenses of carrying out projects and providing services to improve water quality and reduce stormwater and urban runoff pollution in the District.³⁵ The statute requires the District to allocate the revenues derived from the fees as follows: ten percent to the district for implementation and administration of water quality programs; forty percent to the cities within the boundaries of the district and to the County of Los Angeles for water quality improvement programs; and 50 percent to the nine watershed authority groups to implement collaborative water quality improvement plans or programs.³⁶ The Fact Sheet estimates the revenues generated and allocated pursuant to Assembly Bill 2554 as follows:

In addition to current funding options, future funding options continue to be created. Assembly Bill 2554, known as the Los Angeles County Flood Control District’s Water Quality Funding Initiative, is currently under consideration by the LACFCD’s Board of Supervisors. If the Board of Supervisors approve the fee proposal and no majority protest is received, then it will be submitted for voter approval and could create an estimated annual revenue of \$300 million to be utilized for various storm water projects including but not limited to:

- New and Existing Water Quality Projects and Programs
- Maintenance of Existing Facilities
- TMDL and MS4 Permit Implementation

³⁴ *County of Fresno v. State of California* (1991) 53 Cal.3d 482, 487 (Reimbursement is required only when “the costs in question can be recovered solely from tax revenues.”). See also, *County of Sonoma v. Commission on State Mandates* (2000) 84 Cal.App.4th 1264, 1283; *County of Los Angeles v. Commission on State Mandates* (2003) 110 Cal.App.4th 1176, 1189; *Bell Community Redevelopment Agency v. Woosley* (1985) 169 Cal.App.3d 24, 32; *Redevelopment Agency v. Commission on State Mandates* (1997) 55 Cal.App.4th 976, 986-987; *City of El Monte v. Commission on State Mandates* (2000) 83 Cal.App.4th 266, 281.

³⁵ Water Code Appendix, section 28-2 (Stats. 2010, ch. 602 (AB 2554, sections 8a and 8b)).

³⁶ Water Code Appendix, section 28-2 (Stats. 2010, ch. 602 (AB 2554, section 8b)).

Of the annual revenue, forty percent would be returned to the municipalities to create new local projects and programs and maintenance. Below are the estimated revenues that would be allocated to certain municipalities based on the estimated annual revenue of \$300 million.

Municipalities	Estimated Annual Revenue
City of Los Angeles	\$37 million
City of Santa Monica	\$1 million
El Segundo	\$600,000
Manhattan Beach	\$300,000
Redondo Beach	\$750,000
Unincorporated Areas on Los Angeles County	\$15 million

Fifty percent of the annual revenue would be spread across nine watershed authority groups (WAGs) to develop Water Quality Improvement Plans and implement regional projects and programs. Some examples of the possible annual revenues available to the WAGs are provided below:

WAG	Estimated Revenue
Santa Monica Bay	\$12 million
Upper Los Angeles River	\$36 million
Lower Los Angeles River	\$15 million
Upper San Gabriel River	\$17 million

The remaining ten percent of the annual revenues would be allocated to the Los Angeles County Flood Control District for administration of the program and other district water quality projects and programs. [Fn. omitted.]

The Fact Sheet also shows funding that can be applied to stormwater costs from local Propositions A and O, and other state and grant funds. [Fn. omitted.]

Funds received from the Los Angeles Flood Control Act are not the claimants' proceeds of taxes. Accordingly, no changes to Section VII. of the Parameters and Guidelines are recommended.³⁷

Accordingly, no changes to Section VII. of the Parameters and Guidelines have been made.

³⁷ Exhibit A, Corrected Test Claim Decision, pages 241-242.

F. The Remaining Sections of the Parameters and Guidelines

The remaining sections of the Parameters and Guidelines contain standard boilerplate language.

V. Conclusion

Based on the foregoing, the Commission hereby adopts the Proposed Decision and Parameters and Guidelines.

PARAMETERS AND GUIDELINES³⁸

*California Regional Water Quality Control Board, Los Angeles Region,
Order No. R4-2012-0175, Part VI.E.1.c. and Attachments M, O, P, and Q,
(which incorporate by reference Part VI.E.3.)*

13-TC-01 and 13-TC-02

Period of reimbursement is from December 28, 2012, to December 31, 2017

I. SUMMARY OF THE MANDATE

These Parameters and Guidelines address state-mandated activities arising from National Pollutant Discharge Elimination System Program (NPDES) permit, Order No. R4-2012-0175 (test claim permit), adopted by the Los Angeles Water Quality Control Board (Regional Board) on November 8, 2012, and effective on December 28, 2012.

On December 5, 2025, and corrected on January 30, 2026, the Commission on State Mandates (Commission) adopted a Decision partially approving this Test Claim for reimbursement beginning December 28, 2012, and found that Part VI.E.1.c. and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3. of the test claim permit, impose a reimbursable state mandated program for the pro rata costs to develop and submit a WMP or EWMP for only the U.S. EPA-adopted TMDLs identified below and in accordance with Part VI.E.3. as follows:

- a. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall propose BMPs to achieve the WLAs contained in the applicable U.S. EPA-established TMDL, and a schedule for implementing the BMPs that is as short as possible, in a WMP or EWMP.
- b. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below may either individually submit a WMP or may jointly submit a WMP or EWMP with other Permittees subject to the WLAs contained in the U.S. EPA-established TMDL.

³⁸ Please note that the Decision and Parameters and Guidelines is a single document and must be read as a whole. It is not intended to be separated and should be posted in its entirety.

- c. At a minimum, each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall include the following information in its WMP or EWMP, relevant to each applicable U.S. EPA-established TMDL:
 - Available data demonstrating the current quality of the Permittee's MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;
 - A detailed description of BMPs that have been implemented, and/or are currently being implemented by the Permittee to achieve the WLA(s), if any;
 - A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLA(s);
 - A demonstration that the time schedule requested is as short as possible, taking into account the time since USEPA establishment of the TMDL, and technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLA(s); and
 - If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and numeric milestones and the date(s) for their achievement.
- d. Each Permittee subject to a WLA in a TMDL established by U.S. EPA-identified below shall submit a draft of a WMP or EWMP to the Regional Water Board Executive Officer for approval per the schedule Part VI.C.4.³⁹

These requirements apply only to the following U.S. EPA-adopted TMDLs:

- Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL (effective March 26, 2012 (Attachment O)).⁴⁰
- Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachment O for the TMDLs Los Angeles River Watershed Management Area, which include the following: Lake Calabasas Nutrient; Echo Park Lake PCBs, Chlordane, and Dieldrin; and Legg Lake Nutrient Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, and Dieldrin; and Attachment P for the TMDLs in the San

³⁹ Exhibit A, Corrected Test Claim Decision, pages 275-276 citing to Exhibit A, Test Claim 13-TC-01, pages 742, 746-747, 1100, 1105, 1115, 1142, 1143-1154, 1155-1160, and 1161 (test claim permit, Parts VI.E.1.c., VI.E.3., and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3.).

⁴⁰ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, page 1142. The following permittees are required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL: Los Angeles County Flood Control District and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).)

Gabriel River Watershed Management Area, which include the Puddingstone Reservoir Nutrient, Mercury, PCBs, Chlordane, Dieldrin, DDT TMDLs.)⁴¹

- Los Cerritos Channel Metals TMDL, effective March 17, 2010 (Attachment Q).⁴²
- San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P).⁴³
- Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M).⁴⁴

⁴¹ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, page 1143-1154, 1155-1160, 1071 et seq. The following permittees are required to comply with the Los Angeles Area Lakes TMDLs: Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madre, and South El Monte. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1177, citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).)

The permittees in the San Gabriel River Management Area include the Cities of Azusa, Claremont, Irwindale, La Verne, Pomona, San Dimas, the County of Los Angeles, and Los Angeles County Flood Control District. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁴² Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161). The following permittees are required to comply with the Los Cerritos Channel Metals TMDL: Bellflower, Cerritos, Downey, Lakewood, County of Los Angeles, Los Angeles County Flood Control District, Paramount, and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).)

⁴³ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL: Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, County of Los Angeles, and Los Angeles County Flood Control District, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁴⁴ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1105. The following permittees are required to comply with the Malibu Creek Watershed Nutrients TMDL: Agoura Hills, Calabasas, and Hidden Hills, County of Los Angeles, Los Angeles County Flood Control District, Malibu, and Westlake

Reimbursement for these activities is denied beginning January 1, 2018, because the claimants have fee authority sufficient as a matter of law to cover the costs of these activities pursuant to Government Code section 17556(d) and, thus, there are no costs mandated by the state.

In addition, reimbursement for these mandated activities from any source, including but not limited to, state and federal funds, any service charge, fees, or assessments to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes that are used to pay for the mandated activities, shall be identified and deducted from any claim submitted for reimbursement.

All other sections, activities, and costs pled in the Test Claim are denied.

II. ELIGIBLE CLAIMANTS

The cities, county, and special district required to comply with the U.S. EPA-adopted TMDLs listed below, which are subject to the taxing restrictions of articles XIII A and XIII C, and the spending limits of article XIII B, of the California Constitution, whose increased costs for this program are paid from proceeds of taxes, are eligible to claim reimbursement.

- The following permittees required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL, effective March 26, 2012 (Attachment O to test claim permit):

Los Angeles County Flood Control District and City of Signal Hill.⁴⁵

- The following permittees required to comply with the Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachments O and P to the test claim permit for the TMDLs in the Los Angeles River Watershed Management Area and the TMDLs in the San Gabriel River Watershed Management Area):

The following permittees in the Los Angeles River Watershed Management Area (Attachment O to the test claim permit): Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madra, and South El Monte.⁴⁶

The following permittees in the San Gabriel River Management Area (Attachment P to the test claim permit): Cities of Azusa, Claremont,

Village. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K).)

⁴⁵ Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).

⁴⁶ Exhibit A, Corrected Test Claim Decision, pages 276-277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).

Irwindale, La Verne, Pomona, and San Dimas; County of Los Angeles; and Los Angeles County Flood Control District.⁴⁷

- The following permittees required to comply with the Los Cerritos Channel Metals TMDL, effective March 17, 2010:

Cities of Bellflower, Cerritos, Downey, Lakewood, Paramount, and Signal Hill; County of Los Angeles; and Los Angeles County Flood Control District.⁴⁸

- The following permittees required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P):

Cities of Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier; County of Los Angeles; and Los Angeles County Flood Control District.⁴⁹

- The following permittees required to comply with the Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M):

Cities of Agoura Hills, Calabasas, Hidden Hills, Malibu, and Westlake Village; County of Los Angeles; and Los Angeles County Flood Control District.⁵⁰

III. PERIOD OF REIMBURSEMENT

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The claimant filed the Test Claim on June 30, 2014, establishing eligibility for reimbursement for the 2012-2013 fiscal year. However, since the test claim permit has a later effective date, the potential period of reimbursement for this claim begins on the permit's effective date, or December 28, 2012. Beginning January 1, 2018, there are no costs mandated by the state because the claimants have fee authority sufficient as a matter of law to

⁴⁷ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).

⁴⁸ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).

⁴⁹ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).

⁵⁰ Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K.).

cover the costs of these activities pursuant to Government Code section 17556(d). Therefore, costs incurred are reimbursable from December 28, 2012, through December 31, 2017.

Reimbursement for state-mandated costs may be claimed as follows:

1. Actual costs for one fiscal year shall be included in each claim.
2. Pursuant to Government Code section 17561(d)(1)(A), all claims for reimbursement of initial fiscal year costs shall be submitted to the State Controller (Controller) within 120 days of the issuance date for the claiming instructions.
3. Pursuant to Government Code section 17560(a), a local agency may, by February 15 following the fiscal year in which costs were incurred, file an annual reimbursement claim that details the costs actually incurred for that fiscal year.
4. If revised claiming instructions are issued by the Controller pursuant to Government Code section 17558(c), between November 15 and February 15, a local agency filing an annual reimbursement claim shall have 120 days following the issuance date of the revised claiming instructions to file a claim. (Gov. Code §17560(b).)
5. If the total costs for a given fiscal year do not exceed \$1,000, no reimbursement shall be allowed except as otherwise allowed by Government Code section 17564(a).
6. There shall be no reimbursement for any period in which the Legislature has suspended the operation of a mandate pursuant to state law.

IV. REIMBURSABLE ACTIVITIES

To be eligible for mandated cost reimbursement for any fiscal year, only actual costs may be claimed. Actual costs are those costs actually incurred to implement the mandated activities. Actual costs must be traceable and supported by source documents that show the validity of such costs, when they were incurred, and their relationship to the reimbursable activities. A source document is a document created at or near the same time the actual cost was incurred for the event, or activity in question. Source documents may include, but are not limited to, employee time records or time logs, sign-in sheets, invoices, and receipts.

Evidence corroborating the source documents may include, but is not limited to, worksheets, cost allocation reports (system generated), purchase orders, contracts, agendas, training packets, and declarations. Declarations must include a certification or declaration stating, "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct," and must further comply with the requirements of Code of Civil Procedure section 2015.5. Evidence corroborating the source documents may include data relevant to the reimbursable activities otherwise in compliance with local, state, and federal government requirements. However, corroborating documents cannot be substituted for source documents.

The claimant is only allowed to claim and be reimbursed for increased costs for reimbursable activities identified below. Increased cost is limited to the cost of an activity that the claimant is required to incur as a result of the mandate.

For each eligible claimant that incurs increased costs, the following is reimbursable:

- The pro rata costs to develop and submit a WMP or EWMP for only the U.S. EPA-adopted TMDLs identified below and in accordance with Part VI.E.3. as follows:
 - a. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall propose BMPs to achieve the WLAs contained in the applicable U.S. EPA-established TMDL, and a schedule for implementing the BMPs that is as short as possible, in a WMP or EWMP.
 - b. Each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below may either individually submit a WMP or may jointly submit a WMP or EWMP with other Permittees subject to the WLAs contained in the U.S. EPA-established TMDL.
 - c. At a minimum, each Permittee subject to one of the U.S. EPA-adopted TMDLs identified below shall include the following information in its WMP or EWMP, relevant to each applicable U.S. EPA-established TMDL:
 - Available data demonstrating the current quality of the Permittee's MS4 discharge(s) in terms of concentration and/or load of the target pollutant(s) to the receiving waters subject to the TMDL;
 - A detailed description of BMPs that have been implemented, and/or are currently being implemented by the Permittee to achieve the WLA(s), if any;
 - A detailed time schedule of specific actions the Permittee will take in order to achieve compliance with the applicable WLA(s);
 - A demonstration that the time schedule requested is as short as possible, taking into account the time since USEPA establishment of the TMDL, and technological, operation, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the WLA(s); and
 - If the requested time schedule exceeds one year, the proposed schedule shall include interim requirements and numeric milestones and the date(s) for their achievement.

d. Each Permittee subject to a WLA in a TMDL established by U.S. EPA-identified below shall submit a draft of a WMP or EWMP to the Regional Water Board Executive Officer for approval per the schedule Part VI.C.4.⁵¹

These requirements apply only to the following U.S. EPA-adopted TMDLs:

- Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL (effective March 26, 2012 (Attachment O)).⁵²
- Los Angeles Area Lakes TMDLs, effective March 26, 2012 (Attachment O for the TMDLs Los Angeles River Watershed Management Area, which include the following: Lake Calabasas Nutrient; Echo Park Lake PCBs, Chlordane, and Dieldrin; and Legg Lake Nutrient Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, and Dieldrin; and Attachment P for the TMDLs in the San Gabriel River Watershed Management Area, which include the Puddingstone Reservoir Nutrient, Mercury, PCBs, Chlordane, Dieldrin, DDT TMDLs.)⁵³
- Los Cerritos Channel Metals TMDL, effective March 17, 2010 (Attachment Q).⁵⁴

⁵¹ Exhibit A, Corrected Test Claim Decision, pages 275-276 citing to Exhibit A, Test Claim 13-TC-01, pages 742, 746-747, 1100, 1105, 1115, 1142, 1143-1154, 1155-1160, and 1161 (test claim permit, Parts VI.E.1.c., VI.E.3., and Attachments M, O, P, and Q, which incorporate by reference Part VI.E.3.).

⁵² Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, page 1142. The following permittees are required to comply with the Long Beach City Beaches and Los Angeles River Estuary Bacteria TMDL: Los Angeles County Flood Control District and Signal Hill. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1176 citing to Exhibit A, Test Claim 13-TC-01, pages 1070-1071 (test claim permit, Attachment K).)

⁵³ Exhibit A, Corrected Test Claim Decision, page 276 citing to Exhibit A, Test Claim 13-TC-01, pages 1143-1154, 1155-1160, 1071 et seq. The following permittees are required to comply with the Los Angeles Area Lakes TMDLs: Los Angeles County Flood Control District, County of Los Angeles, and the Cities of Los Angeles, Arcadia, Bradbury, Calabasas, Duarte, El Monte, Irwindale, Monrovia, Sierra Madre, and South El Monte. (Exhibit A, Corrected Test Claim Decision, page 276, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1169-1171 (test claim permit, Attachment K).)

The permittees in the San Gabriel River Management Area include the Cities of Azusa, Claremont, Irwindale, La Verne, Pomona, San Dimas, the County of Los Angeles, and Los Angeles County Flood Control District. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1177 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁵⁴ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the Los Cerritos Channel Metals TMDL: Bellflower, Cerritos, Downey, Lakewood, County of Los Angeles, Los Angeles County Flood Control District, Paramount, and Signal Hill.

- San Gabriel River and Impaired Tributaries Metals and Selenium TMDL, effective March 26, 2007 (Attachment P).⁵⁵
- Malibu Creek Watershed Nutrients TMDL, effective March 21, 2003 (Attachment M).⁵⁶

V. CLAIM PREPARATION AND SUBMISSION

Each of the following cost elements must be identified for each reimbursable activity identified in Section IV., Reimbursable Activities, of this document. Each claimed reimbursable cost must be supported by source documentation as described in Section IV. Additionally, each reimbursement claim must be filed in a timely manner.

A. Direct Cost Reporting

Direct costs are those costs incurred specifically for the reimbursable activities. The following direct costs are eligible for reimbursement.

1. Salaries and Benefits

Report each employee implementing the reimbursable activities by name, job classification, and productive hourly rate (total wages and related benefits divided by productive hours). Describe the specific reimbursable activities performed and the hours devoted to each reimbursable activity performed.

2. Materials and Supplies

Report the cost of materials and supplies that have been consumed or expended for the purpose of the reimbursable activities. Purchases shall be claimed at the

(Exhibit A, Corrected Test Claim Decision, page 277, footnote 1178 citing to Exhibit A, Test Claim 13-TC-01, page 1074 (test claim permit, Attachment K).)

⁵⁵ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1161. The following permittees are required to comply with the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL: Arcadia, Artesia, Azusa, Baldwin Park, Bellflower, Bradbury, Cerritos, Claremont, Covina, Diamond Bar, Downey, Duarte, El Monte, Glendora, Hawaiian Gardens, Industry, Irwindale, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, County of Los Angeles, and Los Angeles County Flood Control District, Monrovia, Norwalk, Pico Rivera, Pomona, San Dimas, Santa Fe Springs, South El Monte, Walnut, West Covina, and Whittier.

(Exhibit A, Corrected Test Claim Decision, page 277, footnote 1179 citing to Exhibit A, Test Claim 13-TC-01, pages 1072-1073 (test claim permit, Attachment K).)

⁵⁶ Exhibit A, Corrected Test Claim Decision, page 277 citing to Exhibit A, Test Claim 13-TC-01, page 1105. The following permittees are required to comply with the Malibu Creek Watershed Nutrients TMDL: Agoura Hills, Calabasas, and Hidden Hills, County of Los Angeles, Los Angeles County Flood Control District, Malibu, and Westlake Village. (Exhibit A, Corrected Test Claim Decision, page 277, footnote 1180 citing to Exhibit A, Test Claim 13-TC-01, pages 1065-1066 (test claim permit, Attachment K).)

actual price after deducting discounts, rebates, and allowances received by the claimant. Supplies that are withdrawn from inventory shall be charged on an appropriate and recognized method of costing, consistently applied.

3. Contracted Services

Report the name of the contractor and services performed to implement the reimbursable activities. If the contractor bills for time and materials, report the number of hours spent on the activities and all costs charged. If the contract is a fixed price, report the services that were performed during the period covered by the reimbursement claim. If the contract services are also used for purposes other than the reimbursable activities, only the pro-rata portion of the services used to implement the reimbursable activities can be claimed. Submit contract consultant and attorney invoices with the claim and a description of the contract scope of services.

4. Fixed Assets

Report the purchase price paid for fixed assets (including computers) necessary to implement the reimbursable activities. The purchase price includes taxes, delivery costs, and installation costs. If the fixed asset is also used for purposes other than the reimbursable activities, only the pro-rata portion of the purchase price used to implement the reimbursable activities can be claimed.

B. Indirect Cost Rates

Indirect costs are costs that are incurred for a common or joint purpose, benefiting more than one program, and are not directly assignable to a particular department or program without efforts disproportionate to the result achieved. Indirect costs may include both: (1) overhead costs of the unit performing the mandate; and (2) the costs of the central government services distributed to the other departments based on a systematic and rational basis through a cost allocation plan.

Compensation for indirect costs is eligible for reimbursement in accordance with the Office of Management and Budget Circular 2 CFR, Chapter I and Chapter II, Part 200 et al. Claimants have the option of using the federal de minimis indirect cost rate percentage of direct labor identified in the Office of Management and Budget Circular, at Code of Federal Regulations, title 2, section 200.414(f), excluding fringe benefits, or preparing an Indirect Cost Rate Proposal (ICRP) if the indirect cost rate claimed exceeds the de minimis rate.⁵⁷

If the claimant chooses to prepare an ICRP, both the direct costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) and the indirect costs shall exclude capital expenditures and unallowable costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.). However, unallowable costs must be

⁵⁷ Effective October 1, 2024, the federal de minimis rate was raised from 10 percent to 15 percent. (Code of Federal Regulations, title 2, § 200.414(f) (89 FR 30046, 30092.)

included in the direct costs if they represent activities to which indirect costs are properly allocable.

The distribution base may be: (1) total direct costs (excluding capital expenditures and other distorting items, such as pass-through funds, major subcontracts, etc.); (2) direct salaries and wages; or (3) another base which results in an equitable distribution.

In calculating an ICRP, the claimant shall have the choice of one of the following methodologies:

1. The allocation of allowable indirect costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) shall be accomplished by: (1) classifying a department's total costs for the base period as either direct or indirect; and (2) dividing the total allowable indirect costs (net of applicable credits) by an equitable distribution base. The result of this process is an indirect cost rate which is used to distribute indirect costs to mandates. The rate should be expressed as a percentage that the total amount of allowable indirect costs bears to the base selected; or
2. The allocation of allowable indirect costs (as defined and described in 2 CFR, Chapter I and Chapter II, Part 200 et al.) shall be accomplished by: (1) separating a department into groups, such as divisions or sections, and then classifying the division's or section's total costs for the base period as either direct or indirect; and (2) dividing the total allowable indirect costs (net of applicable credits) by an equitable distribution base. The result of this process is an indirect cost rate that is used to distribute indirect costs to mandates. The rate should be expressed as a percentage which the total amount of allowable indirect costs bears to the base selected.

VI. RECORD RETENTION

Pursuant to Government Code section 17558.5(a), a reimbursement claim for actual costs filed pursuant to this chapter⁵⁸ is subject to the initiation of an audit by the Controller no later than three years after the date that the actual reimbursement claim is filed or last amended, whichever is later. However, if no funds are appropriated or no payment is made to a claimant for the program for the fiscal year for which the claim is filed, the time for the Controller to initiate an audit shall commence to run from the date of initial payment of the claim. In any case, an audit shall be completed not later than two years after the date that the audit is commenced. All documents used to support the reimbursable activities, as described in Section IV., must be retained during the period subject to audit. If an audit has been initiated by the Controller during the period subject to audit, the retention period is extended until the ultimate resolution of any audit findings.

⁵⁸ This refers to title 2, division 4, part 7, chapter 4 of the Government Code.

VII. OFFSETTING REVENUES AND REIMBURSEMENTS

Any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement. Such offsetting revenue or reimbursement includes the following:

- Revenue from the Los Angeles Flood Control Act, which authorizes the Flood Control District to impose a fee or charge, in compliance with article XIII D of the California Constitution, to pay the costs and expenses of carrying out projects and providing services to improve water quality and reduce stormwater and urban runoff pollution in the District.⁵⁹
- Revenues from property-related stormwater fees.

VIII. STATE CONTROLLER'S CLAIMING INSTRUCTIONS

Pursuant to Government Code section 17558(b), the Controller shall issue claiming instructions for each mandate that requires state reimbursement not later than 90 days after receiving the adopted parameters and guidelines from the Commission, to assist local governments in claiming costs to be reimbursed. The claiming instructions shall be derived from these parameters and guidelines and the decisions on the test claim and parameters and guidelines adopted by the Commission.

Pursuant to Government Code section 17561(d)(1), issuance of the claiming instructions shall constitute a notice of the right of the eligible claimants to file reimbursement claims, based upon parameters and guidelines adopted by the Commission.

IX. REMEDIES BEFORE THE COMMISSION

Upon request of an eligible claimant, the Commission shall review the claiming instructions issued by the Controller or any other authorized state agency for reimbursement of mandated costs pursuant to Government Code section 17571. If the Commission determines that the claiming instructions do not conform to the parameters and guidelines, the Commission shall direct the Controller to modify the claiming instructions and the Controller shall modify the claiming instructions to conform to the parameters and guidelines as directed by the Commission.

In addition, requests may be made to amend parameters and guidelines pursuant to Government Code section 17557(d), and California Code of Regulations, title 2, section 1183.17.

⁵⁹ Water Code Appendix, section 28-2 (Stats. 2010, ch. 602 (AB 2554, sections 8a and 8b)).

X. LEGAL AND FACTUAL BASIS FOR THE PARAMETERS AND GUIDELINES

The decisions adopted for the test claim and parameters and guidelines are legally binding on all parties and interested parties and provide the legal and factual basis for the parameters and guidelines. The support for the legal and factual findings is found in the administrative record. The administrative record is on file with the Commission.

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 February 18, 2026, I served the:

- **Current Mailing List dated February 3, 2026**
- **Decision and Parameters and Guidelines adopted February 13, 2026**

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

County of Los Angeles; Los Angeles County Flood Control District; and the Cities of Agoura Hills, Bellflower, Beverly Hills, Carson, Cerritos, Commerce, Downey, Huntington Park, Lakewood, Manhattan Beach, Norwalk, Pico Rivera, Rancho Palos Verdes, Redondo Beach, Santa Fe Springs, Signal Hill, South El Monte, Vernon, Westlake Village, and Whittier, 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 February 18, 2026 at Sacramento, California.



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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 2/3/26

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 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.)

Shahid Abbas, Director of Public Works, *City of Commerce*
Public Works, 2535 Commerce Way, Commerce, CA 90040
Phone: (323) 722-4805
sabbas@commerceca.gov

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

Rachelle Anema, Assistant Auditor-Controller, *County of Los Angeles*
Accounting Division, 500 W. Temple Street, Los Angeles, CA 90012
Phone: (213) 974-8321
RANEMA@auditor.lacounty.gov

Lili Apgar, Specialist, *State Controller's Office*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 324-0254
lapgar@sco.ca.gov

Socorro Aquino, *State Controller's Office*
Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-7522
SAquino@sco.ca.gov

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

Aaron Avery, Legislative Representative, *California Special Districts Association*
1112 I Street Bridge, Suite 200, Sacramento, CA 95814
Phone: (916) 442-7887
Aarona@csda.net

Harmeet Barkschat, *Mandate Resource Services,LLC*
5325 Elkhorn Blvd. #307, Sacramento, CA 95842
Phone: (916) 727-1350
harmeet@comcast.net

David Bass, Vice Mayor, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 663-8504
David.Bass@rocklin.ca.us

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

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*
300 North Coast Highway, Oceanside, CA 92054

Phone: (760) 435-3065
citymanager@oceansideca.org

Roger Bradley, City Manager, *City of Downey*

Claimant Contact

11111 Brookshire, Downey, CA 90241-7016

Phone: (562) 904-7284

citymanager@downeyca.org

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

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

Daniel Calleros, Interim City Administrator, *City of Vernon*

Claimant Contact

4305 Santa Fe Avenue, Vernon, CA 90058

Phone: (323) 583-8811

Dcalleros@cityofvernonCA.gov

Steve Carmona, City Manager, *City of Pico Rivera*

Claimant Contact

6615 Passons Boulevard, Pico Rivera, CA 90660

Phone: (562) 801-4371

scarmona@pico-rivera.org

Julissa Ceja Cardenas, *California State Association of Counties*

1100 K Street, Suite 101, Sacramento, CA 95814

Phone: (916) 327-7500

jcejacardenas@counties.org

Sheri Chapman, General Counsel, *League of California Cities*

1400 K Street, Suite 400, Sacramento, CA 95814

Phone: (916) 658-8267

schapman@calcities.org

Ali Chemkhi, Senior Supervising Accountant/Auditor, *County of San Bernardino*

Office of Auditor-Controller, 268 West Hospitality Lane, Fourth Floor, San Bernardino, CA 92415-0018

Phone: (909) 382-7035

ali.chemkhi@sbcountyatc.gov

Annette Chinn, *Cost Recovery Systems, Inc.*
705-2 East Bidwell Street, #294, Folsom, CA 95630
Phone: (916) 939-7901
achinn@comcast.net

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

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

Ray Cruz, City Manager, *City of Santa Fe Springs*
Claimant Contact
11710 East Telegraph Road, Santa Fe Springs, CA 90670
Phone: (562) 868-0511
rcruz@santafesprings.org

Rob de Geus, City Manager, *City of Westlake Village*
Claimant Contact
31200 Oakcrest Drive, Westlake Village, CA 91361
Phone: (808) 706-1613
rob@wlv.org

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

Nicole Denow, Chief Deputy City Attorney, *City of San Diego*
Environment Section, 1200 Third Avenue, Suite 1100, San Diego, CA 92101
Phone: (619) 533-6173
NDenow@sandiego.gov

Rafael Fajardo, Director of Public Works, *City of Covina*
125 E College Street, Covina, CA 91723
Phone: (626) 384-5220
rfajardo@covinaca.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, *County of Solano*
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

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

John Funk, City Attorney, *City of Downey*

11111 Brookshire Avenue, Downey, CA 90241

Phone: (562) 904-7288

jfunk@downeyca.org

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

12401 Wilshire Blvd, Suite 200, Los Angeles, CA 90025

Phone: (213) 629-8787

hgest@burhenngest.com

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

Jolene Guerrero, Assistant Deputy Director, *Los Angeles County Public Works*

900 S. Fremont Ave. , Alhambra, CA 91803

Phone: (626) 300-4665

jguerrero@dpw.lacounty.gov

Nathan Hamburger, City Manager, *City of Agoura Hills*

Claimant Contact

30001 Ladyface Court, Agoura Hills, CA 91301

Phone: (818) 597-7300

nhamburger@ci.agoura-hills.ca.us

Ernie Hernandez, City Manager, *City of Commerce*

Claimant Contact

2535 Commerce Way, Commerce, CA 90040

Phone: (323) 722-4805

ehernandez@ci.commerce.ca.us

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

Ken Howell, Senior Management Auditor, *State Controller's Office*
Audits, Compliance Audits Bureau, 3301 C Street, Suite 725A, Sacramento, CA 95816
Phone: (916) 323-2368
KHowell@sco.ca.gov

Nancy Hunt-Coffey, City Manager, *City of Beverly Hills*

Claimant Contact
455 N Rexford Drive, Beverly Hills, CA 90210
Phone: (310) 285-1014
citymanager@beverlyhills.org

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

Angelo Joseph, Supervisor, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0706
AJoseph@sco.ca.gov

Emma Jungwirth, Senior Legislative Advocate, *California State Association of Counties (CSAC)*
1100 K Street, Ste 101, Sacramento, CA 95814
Phone: (916) 650-8115
ejungwirth@counties.org

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

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@smgov.org

William Lee, Chief Deputy District Attorney, *County of San Bernardino District Attorney's Office*
303 W. 3rd Street, San Bernardino, CA 92415-0502
Phone: (909) 382-3800
WLee@sbcda.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

Robert Lopez, City Manager, *City of Cerritos*
Claimant Contact
18125 Bloomfield Ave, Cerritos, CA 90703
Phone: (562) 916-1310
ralopez@cerritos.us

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*
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0706
DMar@sco.ca.gov

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

Gilbert Marquez, Principal Civil Engineer/City Engineer, *City of Carson*

701 E. Carson Street, Carson, CA 90745

Phone: (310) 830-7600

gmarquez@carsonca.gov

Frederick Mayo, Water Utilities Director, *City of Oceanside*

300 N. Coast Highway, Oceanside, CA 92054

Phone: (760) 435-5827

fmayo@oceansideca.org

Thaddeus McCormack, City Manager, *City of Lakewood*

Claimant Contact

5050 Clark Avenue, Lakewood, CA 90712

Phone: (562) 866-9771

tmack@lakewoodcity.org

Conal McNamara, City Manager, *City of Whittier*

Claimant Contact

13230 Penn Street, Whittier, CA 90602

Phone: (562) 567-9300

admin@cityofwhittier.org

Michelle Mendoza, *MAXIMUS*

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

Phone: (949) 440-0845

michellemendoza@maximus.com

Ara Mihranian, City Manager, *City of Ranchos Palos Verdes*

Claimant Contact

30940 Hawthorne Blvd, Rancho Palos Verdes, CA 90275

Phone: (310) 544-5202

aram@rpvca.gov

Talyn Mirzakhanian, City Manager, *City of Manhattan Beach*

Claimant Contact

1400 Highland Ave., Manhattan Beach, CA 90266

Phone: (310) 802-5302

tmirzakhanian@citymb.info

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

915 L Street, Sacramento, CA 95814

Phone: (916) 445-8918

Marilyn.Munoz@dof.ca.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

Kaleb Neufeld, Assistant Controller, *City of Fresno*

2600 Fresno Street, Fresno, CA 93721

Phone: (559) 621-2489

Kaleb.Neufeld@fresno.gov

Jenny Newman, Assistant Executive Officer, *Los Angeles Regional Water Quality Control Board*

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

Phone: (213) 576-6686
Jenny.Newman@waterboards.ca.gov

Andy Nichols, *Nichols Consulting*
1857 44th Street, Sacramento, CA 95819
Phone: (916) 455-3939
andy@nichols-consulting.com

Adriana Nunez, Staff Counsel, *State Water Resources Control Board*
Los Angeles Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814
Phone: (916) 322-3313
Adriana.Nunez@waterboards.ca.gov

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

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

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

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

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

Johnnie Pina, Legislative Policy Analyst, *League of Cities*
1400 K Street, Suite 400, Sacramento, CA 95814

Phone: (916) 658-8214
jpina@cacities.org

Neil Polzin, City Treasurer, *City of Covina*
125 East College Street, Covina, CA 91723
Phone: (626) 384-5400
nopolzin@covinaca.gov

Trevor Power, Accounting Manager, *City of Newport Beach*
100 Civic Center Drive, Newport Beach, CA 92660
Phone: (949) 644-3085
tpower@newportbeachca.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

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

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

Ivar Ridgeway, Senior Environmental Scientist, *Los Angeles Regional Water Quality Control Board*
320 West 4th Street, Suite 200, Los Angeles, CA 90013-2343
Phone: (213) 576-6686
ivar.ridgeway@waterboards.ca.gov

Chad Rinde, Director of Finance, *County of Sacramento*
700 H Street, Room 3650, Sacramento, CA 95814
Phone: (916) 874-7248
RindeC@SacCounty.gov

David Roberts, City Manager, *City of Carson*
Claimant Contact
701 E. Carson St, Carson, CA 90745
Phone: (310) 952-1730
DRoberts@carsonca.gov

Rene Salas, City Manager, *City of South El Monte*
Claimant Contact
1415 Santa Anita Avenue, South El Monte, CA 91733
Phone: (626) 579-6540
rsalas@soelmonte.org

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

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

Camille Shelton, Chief Legal Counsel, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
camille.shelton@csm.ca.gov

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

Jeffrey L. Stewart, City Manager, *City of Bellflower*
Claimant Contact
16600 Civic Center Drive, Bellflower, CA 90706
Phone: (562) 804-1424
jstewart@bellflower.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

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

Carlo Tomaino, City Manager, *City of Signal Hill*
Claimant Contact
2175 Cherry Ave, Signal Hill, CA 90755
Phone: (562) 989-7305
ctomaino@cityofsignalhill.org

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

Kelli Tunnicliff, Director of Public Works, *City of Signal Hill*
2175 Cherry Avenue, Signal Hill, CA 90755

Phone: (562) 989-7356
ktunnicliff@cityofsignalhill.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

Oscar Valdez, Auditor-Controller, *County of Los Angeles*

Claimant Contact

Auditor-Controller's Office, 500 West Temple Street, Room 525, Los Angeles, CA 90012
Phone: (213) 974-8302
ovaldez@auditor.lacounty.gov

Alejandra Villalobos, Management Services Manager, *County of San Bernardino*
Office of Auditor-Controller, 222 West Hospitality Lane, Forth Floor, San Bernardino, CA 92415
Phone: (909) 382-3191
alejandra.villalobos@sbcountyatc.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

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

Mike Witzansky, City Manager , *City of Redondo Beach*
Claimant Contact
415 Diamond Street, Redondo Beach, CA 90277
Phone: (310) 318-0630
mike.witzansky@redondo.org

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

Arthur Wylene, General Counsel, *Rural County Representatives of California (RCRC)*
1215 K Street, Suite 1650, Sacramento, CA 95814
Phone: (916) 447-4806
awylene@rcrcnet.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@cityofpleasanton.ca.gov

Traci Young, IS Project Director, *City and County of San Francisco*
San Francisco Public Utilities Commission (SFPUC), 525 Golden Gate Ave, San Francisco, CA
94102
Phone: (415) 653-2583
tmyoung@sfpwater.org

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

Aly Zimmermann, City Manager, *City of Rocklin*
3970 Rocklin Road, Rocklin, CA 95677
Phone: (916) 625-5585
alyz@rocklin.ca.us

Helmholst 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