



May 25, 2017

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

RE: Notice of Incomplete Joint Test Claim Filing

Los Angeles Region Water Permit – County of Los Angeles, 13-TC-02
California Regional Water Quality Control Board, Los Angeles Region,
Order No. R4-2012-0175
County of Los Angeles and Los Angeles County Flood Control District, Claimants

Dear Messrs. and Ms. George, Gest, and Naimo:

The Commission on State Mandates (Commission) received the Test Claim filed by the County of Los Angeles and the Los Angeles County Flood Control District (claimants) on June 30, 2014. The Test Claim alleges reimbursable state-mandated activities arising from NPDES permit No. CAS004001, Order R4-2012-0175 (Order), adopted by the Los Angeles Regional Water Quality Control Board (regional board).

Although the Test Claim was deemed complete on July 10, 2014, an initial review of the filings by legal staff revealed that it is incomplete because it: (1) was filed beyond the statute of limitation because it was filed more than 12 months beyond the effective date of the Order; (2) does not meet the requirements in Title 2, California Code of Regulations, section 1183.1(a) specifying personnel authorized to file a test claim on behalf of a local agency; and (3) is missing a detailed description of increased costs and a statewide estimate of costs as required by Government Code section 17553.¹ However, it may be possible to cure this test claim filing as described below.

To Be Considered Timely Filed

Government Code 17551(c) requires a local agency to file a test claim “not later than 12 months following the effective date of a statute or executive order, or within 12 months of incurring increased costs as a result of a statute or executive order, whichever is later.” Section 1183 of

¹ A completeness review of a test claim is not intended as a legal review, and in fact, does not go through legal review.

the Commission regulations state that “[f]or the purposes of claiming based on the date of first incurred costs, ‘within 12 months’ means by June 30 of the fiscal year following the fiscal year in which increased costs were *first incurred* by the test claimant.” (Emphasis added.)

The Order lists November 8, 2012 as the adoption date by the regional board. With regard to the effective date of the permit, the Order states: “This Order becomes effective on December 28, 2012.”²

In this case, 12 months after the effective date of the Order is December 28, 2013; the Test Claim here was filed on June 30, 2014, beyond the statute of limitations in section 17551 and there is no assertion or evidence in the record of when costs were first incurred under the Order. Therefore, per the Order’s effective date, the Test Claim was filed beyond the statute of limitations.

It is settled principle that administrative agencies have only such powers as have been conferred upon them, expressly or by implication, by constitution or statute. An administrative agency, therefore, must act within the powers conferred upon it by law and may not validly act in excess of such powers. When an administrative agency acts in excess of the powers conferred upon it, its action is void.³ The Commission is a quasi-judicial administrative agency, whose authority is provided solely by statute. Pursuant to Government Code section 17551(b), the Commission’s review of a test claim may be had “*only if*” the test claim is filed within the time limits specified in sections 17551(c), 17573, and 17574. Therefore, the Commission, by statute, does not have jurisdiction over this Test Claim because based on the evidence in the record, the claim was filed beyond the statute of limitations as a matter of law. Administrative orders are void when rendered without fundamental jurisdiction, or in excess of the agency’s statutory powers, and may be collaterally attacked at any time.⁴

Who May File a Test Claim on Behalf of a Local Agency?

Pursuant to section 1183.1(a) of Commission regulations, only specified authorized local agency officials may file on behalf of a county or special district.

For counties, only a “county auditor, auditor-controller, or director of finance who has assumed the duties of controller, may file on behalf of a county.” In this filing, Ms. Angela George, Principal Engineer, Watershed Management Division may not be named as Claimant Contact in *Section 2. Claimant Information* on the test claim form or act as the authorized signatory in *Section 8. Claim Certification* of the test claim form because this position is not listed in section 1183.1(a)(1) and no resolution or ordinance of the county has been filed with the Test Claim to show that the board of supervisors designated her to represent and bind the county on mandate issues. Additionally, Mr. John Naimo, Acting Auditor-Controller, is an authorized signatory but

² Test Claim 13-TC-02, page 74 (Order, page 9).

³ *Ferdig v. State Personnel Bd.* (1969) 71 Cal.2d 96, 103; *Aylward v. State Board etc. Examiners* (1948) 31 Cal.2d 833, 839; *Graves v. Commission on Professional Competence* (1976) 63 Cal.App.3d 970, 976.

⁴ *City and County of San Francisco v. Ang* (1979) 97 Cal.App.3d 673, 677–679; *Aylward v. State Board etc. Examiners* (1948) 31 Cal.2d 833, 839; *B.W. v. Board of Medical Quality Assurance* (1985) 169 Cal.App.3d 219, 234; *City and County of San Francisco v. Padilla* (1972) 23 Cal.App.3d 388, 400.

his address, telephone number, and email address were not provided as required. (Government Code 17553(b)(4).) Though Ms. Angela George may not serve as signatory, anyone who specifically requests to be on the mailing list for a matter is included on all service of written materials and may participate in the mandate determination process.

For special districts, pursuant to section 1183.1(a)(5) of Commission regulations, only a “general manager or other officer with authority delegated by the governing body by ordinance or resolution may file on behalf of a special district.” Therefore, only an official authorized in section 1183.1(a)(5) of the Commission’s regulations may be named as Claimant Contact in *Section 2. Claimant Information* on the test claim form, or act as the authorized signatory in *Section 8. Claim Certification* of the test claim form. Thus, neither Ms. Angela George, Principal Engineer, Watershed Management Division nor Mr. John Naimo, Acting Auditor-Controller, may be named as Claimant Contact in *Section 2. Claimant Information* on the test claim form, nor may either act as the authorized signatory for purposes of *Section 8. Claim Certification* of the test claim form because neither are the general manager, and no resolution or ordinance of the district has been filed with the Test Claim to show that the district’s governing board has designated either of them to represent and bind the district on mandate issues. Again, anyone who specifically requests to be on the mailing list for a matter will be included on all service of written materials.

Further, *Section 8. Claim Certification* of the test claim form may be signed by a different person (i.e. another *authorized* local agency official specified section 1183.1(a) of Commission regulations) than is indicated in *Section 2. Claimant Information* so long as the declarant’s address, telephone number, and email address are also provided. (Government Code 17553(b)(4).) Note that the designated representative may not sign here because this is also the form that provides for the official designation of the representative by the claimant and only the claimant may make such a designation.

A Detailed Description of Costs Is Required.

Government Code section 17553 specifies that all test claims shall contain at least the following elements:

- (A) *A detailed description of the new activities and costs that arise from the mandate.*
- (B) *A detailed description of existing activities and costs that are modified by the mandate.*
- (C) *The actual increased costs incurred by the claimant during the fiscal year for which the claim was filed to implement the alleged mandate.*
- (D) *The actual or estimated annual costs that will be incurred by the claimant to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the claim was filed.*
- (E) *A statewide cost estimate of increased costs that all local agencies or school districts will incur to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the claim was filed.*

Under *Section 5. Written Narrative*, the claimants are directed to:

Include a statement that the actual and/or estimated costs resulting from the alleged mandate exceeds one thousand dollars (\$1,000), **and** include all of the following elements for each statute or executive order alleged:

- (A) A detailed description of the new activities and costs that arise from the mandate.
- (B) A detailed description of existing activities and costs that are modified by the mandate.
- (C) The actual increased costs incurred by the claimant during the fiscal year for which the claim was filed to implement the alleged mandate.
- (D) The actual or estimated annual costs that will be incurred by the claimant to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the claim was filed.
- (E) A statewide cost estimate of increased costs that all local agencies or school districts will incur to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the claim was filed.

For this Test Claim to be complete, the detailed costs description set forth in Government Code section 17553, must be included in the narrative.

The Narrative and Any Allegations of Fact Must Be Supported with Evidence in the Record.

Government Code section 17553(b)(2)(A-D) specifies that the written narrative shall be supported with declarations under penalty of perjury, based on the declarant's personal knowledge, information, or belief, and signed by persons who are authorized and competent to do so, as follows:

- (A) *Declarations of actual or estimated increased costs* that will be incurred by the claimant to implement the alleged mandate.
- (B) *Declarations identifying all local, state, or federal funds, or fee authority that may be used to offset the increased costs* that will be incurred by the claimant to implement the alleged mandate, including direct and indirect costs.
- (C) *Declarations describing new activities performed to implement specified provisions of the new statute or executive order* alleged to impose a reimbursable state-mandated program. Specific references shall be made to chapters, articles, sections, or page numbers alleged to impose a reimbursable state-mandated program.
- (D) If applicable, declarations describing the period of reimbursement and payments received for full reimbursement of costs for a legislatively determined mandate pursuant to Section 17573, and the authority to file a test claim pursuant to paragraph (1) of subdivision (c) of Section 17574.

Government Code section 17559(b) provides that a claimant or the state may commence a proceeding in accordance with the provisions of section 1094.5 of the Code of Civil Procedure to set aside a decision of the Commission on the ground that the Commission's decision is not supported by substantial evidence in the record. This requires that each finding of fact that the

Commission makes (including whether there are costs mandated by the state, which is a mixed issue of law and fact) must meet the *Topanga* standard.⁵ In *Topanga* the court explained:

Section 1094.5 clearly contemplates that at minimum, the reviewing court must determine both whether substantial evidence supports the administrative agency's findings and whether the findings support the agency's decision. Subdivision (b) of Code of Civil Procedure section 1094.5 prescribes that when petitioned for a writ of mandamus, a court's inquiry should extend, among other issues, to whether 'there was any prejudicial abuse of discretion.' Subdivision (b) then defines "abuse of discretion" to include instances in which the administrative order or decision 'is not supported by the findings, or the findings are not supported by the evidence.' (Emphasis added.) Subdivision (c) declares that 'in all . . . cases' (emphasis added) other than those in which the reviewing court is authorized by law to judge the evidence independently, 'abuse of discretion is established if the court determines that the findings are not supported by substantial evidence in the light of the whole record.' . . .

For this Test Claim to be complete, the detailed costs descriptions set forth in Government Code section 17553, must be supported by the declaration(s) and other evidence (if applicable).

For a Joint Test Claim, Claimants Must Agree on All Issues of the Test Claim.

A crucial requirement for a joint test claim is that "claimants agree on all issues of the test claim." (Title 2, California Code of Regulations, section 1183.1(g)(2).) This agreement should be indicated in the narrative and declarations.

Curing This Test Claim

1. A revised test claim form from each co-claimant that:
 - A. Provides claimant information of an individual authorized to file on behalf of the agency under section 1183.1 of the Commission's regulations in *Section 2. Claimant Information*.
 - B. Provides a signature and complete contact information of an individual authorized to file on behalf of the agency pursuant to section 1183.1 of the Commission's regulations in *Section 8. Claim Certification*.
 - C. Designates a single claimant representative, common to all joint claimants, in *Section 3. Claimant Representative Information* on the test claim form pursuant to section 1183.1(g)(3) of Commission regulations.⁶
2. Revised written narratives and declarations that indicate that they agree on all issues of the test claim and that provide a detailed description of the costs that are modified by the alleged mandate including the *actual* increased costs incurred by each co-

⁵ *Topanga Association for a Scenic Community v. County Of Los Angeles* (1974) 11 Cal.3d 506.

⁶ It has been noted that the test claim forms filed for 13-TC-02 have already designated a single representative as required in *Section 3: Claimant Representative Information*, in this case Mr. Howard Gest, to represent the joint claimants. The revised forms should also include a single claimant representative.

claimant during the fiscal year for which the joint test claim was filed as well as the actual or estimated annual costs that will be incurred by each co-claimant to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the joint test claim was filed. In addition, please provide the statewide cost estimate (in this case the "statewide cost" is the cost for all of the local agency co-permittees, whether named or not, for the alleged new program or higher level of service imposed by the permit at issue) for increased costs to implement the alleged mandate during the fiscal year immediately following the fiscal year for which the joint test claim was filed.

Please note that section 17553(b)(2) of the Government Code requires the following with regard to the written narrative:

The written narrative shall be supported with declarations under penalty of perjury, based on the declarant's personal knowledge, information or belief, and signed by persons who are authorized and competent to do so as follows:

(A) Declarations of actual or estimated increased costs that will be incurred by the claimant to implement the alleged mandate.

(B) Declarations identifying all local, state, or federal funds, or fee authority that may be used to offset the increased costs that will be incurred by the claimant to implement the alleged mandate, including direct and indirect costs.

(C) Declarations describing new activities performed to implement specified provisions of the new statute or executive order alleged to impose a reimbursable state-mandated program. Specific references shall be made to chapters, articles, sections, or page numbers alleged to impose a reimbursable state-mandated program.

(D) If applicable, declarations describing the period of reimbursement and payments received for full reimbursement of costs for a legislatively determined mandate pursuant to Section 17573, and the authority to file a test claim pursuant to paragraph (1) of subdivision (c) of Section 17574.

Retaining Your Original Filing Date

To retain the original filing date, please refile *only* the following required elements to cure this Test Claim:⁷ (1) revised test claim forms from each co-claimant; and (2) written narratives and declarations, as specified above, which will supersede any initial filings with the Commission within 30 days of the date of this letter by **June 26, 2017**. If a complete test claim filing is not received within 30 calendar days from the date of this letter, the executive director may disallow the original test claim filing date. (Cal. Code Regs., tit. 2, § 1183.1(f).) As provided in the Commission's regulations, a real party in interest may appeal to the Commission for review of

⁷ Please do not refile the supporting documentation, which is already nearly 800 pages. Commission staff will replace the current test claim forms, written narratives, and declarations with the revised ones and will append any additional supporting documentation filed as evidence of costs to the back of the supporting documentation currently on file.

Messrs. and Ms. George, Gest, and Naimo
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the actions and decisions of the executive director. Please refer to California Code of Regulations, title 2, section 1181.1(c).

The filing may be submitted electronically via the Commission's e-filing system pursuant to section 1181.3 of the Commission's regulations and will replace the specified elements of the original filing. Please see the Commission's website at

http://www.csm.ca.gov/dropbox_procedures.php

Sincerely,



Heather Halsey
Executive Director

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

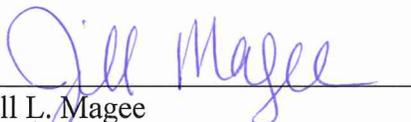
On May 25, 2017, I served the:

- **Notice of Incomplete Joint Test Claim Filing issued May 25, 2017**

Los Angeles Region Water Permit – County of Los Angeles, 13-TC-02
California Regional Water Quality Control Board Los Angeles Region,
Order No. R4-2012-0175
County of Los Angeles and Los Angeles County Flood Control District, Claimants

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on May 25, 2017 at Sacramento, California.



Jill L. Magee
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 5/24/17

Claim Number: 13-TC-02

Matter: Los Angeles Region Water Permit - County of Los Angeles

Claimants: 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.)

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