



February 25, 2026

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

Mr. Raymond Palmucci  
Office of the San Diego City Attorney  
1200 Third Avenue, Suite 1100  
San Diego, CA 92101

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

**Re: Draft Proposed Statewide Cost Estimate, Schedule for Comments, and Notice of Hearing**  
*Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2*  
On Remand from City of San Diego v. Commission on State Mandates,  
Sacramento County Superior Court, Case No. 24WM000056; Permit Amendment  
No. 2017PA-SCHOOLS, City of San Diego Public Water System No. 3710020,  
effective January 18, 2017

Dear Ms. Kato and Mr. Palmucci:

The Draft Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review and comment.

**Written Comments:** Written comments may be filed on the Draft Proposed Statewide Cost Estimate by **March 9, 2026**. You are advised that comments filed with the Commission are required to be electronically filed (e-filed) in an unlocked legible and searchable PDF file, using the Commission's Dropbox. (Cal. Code Regs., tit. 2, § 1181.3(f).) Refer to <https://www.csm.ca.gov/dropbox.shtml> on the Commission's website for electronic filing instructions. If e-filing would cause the filer undue hardship or significant prejudice, filing may occur by first class mail, overnight delivery or personal service only upon approval of a request to the executive director. (Cal. Code Regs., tit. 2, § 1181.3(j).)

**Hearing:** This matter is set for hearing on **Friday, April 10, 2026, at 10:00 a.m., at California Department of Food and Agriculture (CDFA), First Floor Auditorium, 1220 N Street, Sacramento, California, 95814 and via Zoom.**

The Proposed Statewide Cost Estimate will be issued on or about March 27, 2026.

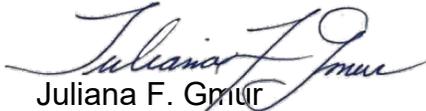
This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on the Consent Calendar.

Please also notify Commission staff not later than noon on the Tuesday prior to the hearing, April 7, 2026, that you or a witness you are bringing plan to testify and please specify the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking both in person and remotely to receive a hearing panelist link in Zoom.

Ms. Kato and Mr. Palmucci  
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The last communication from Commission staff will be the Proposed Statewide Cost Estimate, which will be issued approximately 2 weeks prior to the hearing, and it is incumbent upon the participants to let Commission staff know if they wish to testify or bring witnesses.

Very truly yours,



Juliana F. Grun  
Executive Director

Hearing Date: April 10, 2026

**ITEM \_\_\_\_**  
**DRAFT PROPOSED STATEWIDE COST ESTIMATE**

**\$0 - \$290,151**  
**Initial Claim Period<sup>1</sup>**

Permit Amendment No. 2017PA-SCHOOLS, City of San Diego Public Water System  
No. 3710020, Effective January 18, 2017

*Lead Sampling in Schools: Public Water System No. 3710020*

17-TC-03-R2

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on April 10, 2026 as follows:

<b>Member</b>	<b>Vote</b>
Lee Adams, County Supervisor	
Deborah Gallegos, Representative of the State Controller	
Karen Greene Ross, Public Member	
Renee Nash, School District Board Member	
William Pahland, Representative of the State Treasurer, Vice Chairperson	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	
Alexander Powell, Representative of the Director of the Governor's Office of Land Use and Climate Innovation	

**STAFF ANALYSIS**

**Summary of the Mandate, Eligible Claimants, and Period of Reimbursement**

This Statewide Cost Estimate addresses state-mandated activities arising from a permit amendment issued by the State Water Resources Control Board (State Water Board) to the City of San Diego's public water system, Order No. 2017PA-SCHOOLS and is applicable to the City of San Diego only.

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<sup>1</sup> The entire reimbursement period is presumed to be within the initial claim period because the permit requires the claimant's public water system, beginning January 18, 2017, to test drinking water in K-12 schools for the presence of lead, upon the request of an authorized representative of the school made *prior to* November 1, 2019.

The Commission adopted the Test Claim Decision on March 28, 2025, partially approving reimbursement for the City's increased costs to perform the reimbursable activities under the mandate and adopted the Decision and Parameters and Guidelines on May 23, 2025.

The reimbursement period is January 18, 2017 and is assumed to end by November 1, 2019. January 18, 2017 is the effective date of the permit amendment and November 1, 2019 was the last day for schools to request testing under the test claim permit. Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is required by Health and Safety Code section 116227, and not by the test claim order.

The sole eligible claimant, the City of San Diego, was required to file initial claims with the State Controller's Office (Controller) on or before December 24, 2025. Late initial reimbursement claims may be filed until December 24, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.<sup>2</sup>

As of February 25, 2026, no reimbursement claims have been filed.

### **Reimbursable Activities**

The Commission approved the following reimbursable activities for this program:

1. Submit to the State Water Board's Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter [by the claimant] by July 1, 2017;<sup>3</sup>
2. If an authorized school representative of a private K-12 school or a public K-12 school in the claimant's service area requests lead sampling assistance in writing by November 1, 2019:<sup>4</sup>
  - a. Respond in writing within 60 days and schedule a meeting with school officials to develop a sampling plan;<sup>5</sup>
  - b. Finalize a sampling plan and complete initial sampling within 90 days [or an alternative time schedule approved by DDW];<sup>6</sup>

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<sup>2</sup> Government Code section 17561(d)(3).

<sup>3</sup> Exhibit A, Test Claim Decision, page 75, citing to Test Claim, page 105 (test claim order).

<sup>4</sup> Exhibit A, Test Claim Decision, page 75, citing to Test Claim, page 105 (test claim order).

<sup>5</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>6</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

- c. Collect one to five samples at each school, from regularly used drinking fountains, cafeteria or food preparation areas, or reusable bottle filling stations, selected according to the sampling plan, and using the sampling guidance provided in Appendix A;<sup>7</sup>
- d. Collect lead samples during the school year, on a Tuesday, Wednesday, Thursday, or Friday on a day that school is in session and has been in session for at least one day prior to the day of sampling;<sup>8</sup>
- e. Ensure samples are collected by an adequately trained water system representative;<sup>9</sup>
- f. Submit the samples to an ELAP certified laboratory for analysis;<sup>10</sup>
- g. Require the laboratory to submit the data electronically to DDW;<sup>11</sup>
- h. Provide a copy of the results to the school representative;<sup>12</sup>
- i. Within two business days of a result that shows an exceedance of 15 ppb, notify the school of the sample result;<sup>13</sup>
- j. If an initial sample shows an exceedance of 15 ppb:
  - Collect an additional sample within 10 days if the sample site remains in service;<sup>14</sup>

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<sup>7</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>8</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>9</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>10</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>11</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>12</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>13</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

<sup>14</sup> Exhibit A, Test Claim Decision, page 76, citing to Test Claim, page 106 (test claim order).

- Collect a third sample within 10 business days after notification that a resample result is less than or equal to 15 ppb;<sup>15</sup>
  - Collect at least one more lead sample at a sample site where the school has completed some corrective action following an initial lead sample result over 15 ppb;<sup>16</sup>
- k. Ensure that the water system receives the results of repeat lead samples from the laboratory in no more than 10 business days;<sup>17</sup>
  - l. Discuss the lead sample results with the school prior to releasing the sample results to the public, and within 10 days of receiving the results from the laboratory;<sup>18</sup>
  - m. Communicate with the school after lead sampling and assist the school with the interpretation of laboratory results and provide information regarding potential corrective actions if the results confirm lead levels above 15 ppb.<sup>19</sup> ***The water system is not responsible for the costs of any corrective action or maintenance;***<sup>20</sup>
  - n. Keep records of all requests for lead related assistance and provide the records to DDW, upon request;<sup>21</sup>
  - o. Include in the annual Consumer Confidence Report a statement summarizing the number of schools requesting lead sampling.<sup>22</sup>

***Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that***

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<sup>15</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 106 (test claim order).

<sup>16</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

<sup>17</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

<sup>18</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 107 (test claim order).

<sup>19</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

<sup>20</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

<sup>21</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

<sup>22</sup> Exhibit A, Test Claim Decision, page 77, citing to Test Claim, page 108 (test claim order).

**did not request testing before January 1, 2018, is not required by the test claim order and is not reimbursable.**

**Offsetting Revenues and Reimbursements**

The Decision and Parameters and Guidelines specify 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 (including, but not limited to grant 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.<sup>23</sup>

As no reimbursement claims were filed, no offsetting revenue was identified.

**Statewide Cost Estimate**

As no reimbursement claims were filed, staff relied on the claimant’s actual and projected costs included in the Test Claim and the listed assumptions to develop this Statewide Cost Estimate.

**Table 1. Reimbursement Period Cost Estimate**

<p>1. Submit to the State Water Board’s Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter [by the claimant] by July 1, 2017</p>	<p>[\$0] - [\$6,707]</p>
<p>2. If an authorized school representative of a private K-12 school or a public K-12 school in the claimant’s service area requests lead sampling assistance in writing by November 1, 2019:</p> <ul style="list-style-type: none"> <li>a. Respond in writing within 60 days and schedule a meeting with school officials to develop a sampling plan;</li> <li>b. Finalize a sampling plan and complete initial sampling within 90 days [or an alternative time schedule approved by DDW];</li> <li>c. Collect one to five samples at each school, from regularly used drinking fountains, cafeteria or food preparation areas, or reusable bottle filling stations, selected according to the sampling plan, and using the sampling guidance provided in Appendix A;</li> <li>d. Collect lead samples during the school year, on a Tuesday, Wednesday, Thursday, or Friday on a</li> </ul>	<p>[\$0] - [\$315,683]</p>

<sup>23</sup> Exhibit B, Decision and Parameters and Guidelines, page 18.

<p>day that school is in session and has been in session for at least one day prior to the day of sampling;</p> <ul style="list-style-type: none"> <li>e. Ensure samples are collected by an adequately trained water system representative;</li> <li>f. Submit the samples to an ELAP certified laboratory for analysis;</li> <li>g. Require the laboratory to submit the data electronically to DDW;</li> <li>h. Provide a copy of the results to the school representative;</li> <li>i. Within two business days of a result that shows an exceedance of 15 ppb, notify the school of the sample result;</li> <li>j. If an initial sample shows an exceedance of 15 ppb: <ul style="list-style-type: none"> <li>a. Collect an additional sample within 10 days if the sample site remains in service;</li> <li>b. Collect a third sample within 10 business days after notification that a resample result is less than or equal to 15 ppb;</li> <li>c. Collect at least one more lead sample at a sample site where the school has completed some corrective action following an initial lead sample result over 15 ppb;</li> </ul> </li> <li>k. Ensure that the water system receives the results of repeat lead samples from the laboratory in no more than 10 business days;</li> <li>l. Discuss the lead sample results with the school prior to releasing the sample results to the public, and within 10 days of receiving the results from the laboratory;</li> <li>m. Communicate with the school after lead sampling and assist the school with the interpretation of laboratory results and provide information regarding potential corrective actions if the results confirm lead levels above 15 ppb. <b><i>The water</i></b></li> </ul>	
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<p><b><i>system is not responsible for the costs of any corrective action or maintenance;</i></b></p> <p>n. Keep records of all requests for lead related assistance and provide the records to DDW, upon request;</p> <p>o. Include in the annual Consumer Confidence Report a statement summarizing the number of schools requesting lead sampling.</p>	
Indirect Costs identified	\$0
Offsetting Revenues or Other Reimbursements	(\$0)
10 Percent Late Filing Penalty	(\$32,239)
<b>Total Costs</b>	<b>\$0 - \$290,151</b>

### **Assumptions**

1. As noted above, the reimbursement period is January 18, 2017 and is assumed to end by November 1, 2019. January 18, 2017 is the effective date of the permit amendment and November 1, 2019 was the last day for schools to request testing under the test claim permit. Beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is required by Health and Safety Code section 116227, and not by the test claim order. Health and Safety Code section 116227 required testing of those older schools regardless of whether a school requested the testing. Therefore, it can reasonably be assumed that the reimbursement period for most of the activities will be within the first year of the permit term (second half of FY 2016-17 and first half of FY 2017-2018). Furthermore, declarations in support of the test claim state that of the more than 400 schools served by the City's public water system, 255 had requested lead sampling by January 1, 2018.
2. The claimant stated in its Test Claim that it incurred \$381,960 in actual costs and projected another \$63,915 in estimated costs for a total of \$445,875 for the initial reimbursement period. However, \$115,725 is for preliminary "program planning" activities that do not fall within the plain language of the approved activities. Additionally, \$7,760 is for costs incurred to perform an activity that the Commission determined was not reimbursable (it was required by preexisting law). Therefore, the claimant's costs for this program are projected to be \$322,390.<sup>24</sup>
3. Costs could be lower than the high amount estimate because beginning January 1, 2018, any lead testing conducted by the claimant on those public schools constructed or modernized before January 1, 2010, that did not request testing before January 1, 2018, is not required by the test claim order and is not reimbursable.

<sup>24</sup> Exhibit C, Test Claim, pages 22-51 (test claim narrative).

4. Indirect costs cannot be projected and are, therefore, presumed to be \$0.
5. If claims are filed, the amount claimed for the period of reimbursement may be higher or lower than initial projections in the Test Claim.
6. If claims are filed, costs may be lower if the Controller audits the claims and determines that other offsetting revenues (i.e., funds that are not the claimant's proceeds of taxes) were used by the claimant to pay for the reimbursement activities.
7. If claims are filed, actual costs may be lower if the Controller reduces any claim for this program following an audit deeming the claim to be excessive, unreasonable, or not eligible for reimbursement.

### **Methodology**

Because no claims were filed, and may never be filed, the low-end statewide cost estimate is \$0. As explained below, the high-end statewide cost estimate represents the costs estimated from the Test Claim.<sup>25</sup> At this time, any claims filed would be late claims and have a 10% reduction imposed.

Activity 1. consists of the one-time cost of submitting to the State Water Board's Division of Drinking Water a comprehensive list of the names and addresses of all K-12 schools served water through a utility meter, by the claimant, by July 1, 2017. The projected cost is \$6,707.

Activity 2. consists of a series of activities to respond if an authorized school representative of a private K-12 school or a public K-12 school in the claimant's service area requests lead sampling assistance in writing by November 1, 2019. The projected cost is \$315,683.

**Indirect Costs:** The statewide cost estimate is \$0 because no claims were filed.

**Offsetting Revenues:** The statewide cost estimate is \$0 because no claims were filed.

**Late Filing Penalties:** Any claim filed by the claimant will be late and a late filing penalty will be assessed.

Projected Costs [\$322,390] x (10% late filing penalty) = Estimated Late Filing Penalties [\$32,239].

### **Draft Proposed Statewide Cost Estimate**

On February 25, 2026, Commission staff issued the Draft Proposed Statewide Cost Estimate.<sup>26</sup>

### **Staff Recommendation**

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$0 – \$290,151 for the Initial Claim Period that began on January 18, 2017.

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<sup>25</sup> Exhibit C, Test Claim, pages 22-51 (test claim narrative).

<sup>26</sup> Exhibit D, Draft Proposed Statewide Cost Estimate.

## 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 25, 2026, I served the:

- **Current Mailing List dated February 19, 2026**
- **Draft Proposed Statewide Cost Estimate, Schedule for Comments, and Notice of Hearing issued February 25, 2026**

*Lead Sampling in Schools: Public Water System No. 3710020, 17-TC-03-R2*  
On Remand from City of San Diego v. Commission on State Mandates,  
Sacramento County Superior Court, Case No. 24WM000056; Permit Amendment  
No. 2017PA-SCHOOLS, City of San Diego Public Water System No. 3710020,  
effective January 18, 2017

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 25, 2026 at Sacramento, California.



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

# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 2/19/26

**Claim Number:** 17-TC-03-R2

**Matter:** Lead Sampling in Schools: Public Water System No. 3710020

**Claimant:** City of San Diego

### 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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