

Gavin Newsom Governor

915 L Street = Sacramento CA = 95814-3706 = www.dof.ca.gov

July 18, 2025

Juliana Gmur Executive Director Commission on State Mandates 980 Ninth Street, Suite 300 Sacramento, CA 95814



California Regional Water Quality Control Board, San Francisco Bay Region, 22-TC-07 Order No. R2-2022-0018, as modified by Order No. R2-2023-0019; NPDES Permit No. CAS612008; Provisions C.3.b.ii(4), C.3.b.ii(5), C.3.j.ii(1)(a)- (g), C.3.j.ii(4), C.3.j.ii(2)(a)-(j), C.5.f, C.8.d, C.8.e, C.8.f, C.10.a.i, C.10.a.ii, C.10.e, C.11.c, C.12.a, C.12.c, C.15.b.iii, C.17.a, C.20.b, C.21.b, issued May 11, 2022, effective July 1, 2022, Union City, Claimant

San Francisco Bay Regional Water Quality Control Board and State Water Resources Control Board Comments on Test Claim

Dear Director Gmur:

The Department of Finance (Finance) has noted the comments on the Test Claim 22-TC-07 that were submitted by the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) and the State Water Resources Control Board (State Water Board) (together, Water Boards). Finance is submitting this letter to express its concurrence with the Water Boards comments.

If you have any questions regarding this letter, please contact Donna Ferebee, Senior Staff Counsel at (916) 628-4894 or Marilyn Munoz, Senior Staff Counsel at (916) 628-6028.

Sincerely,

Marilyn Munoz

MARILYN MUNOZ Senior Staff Counsel

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 July 21, 2025, I served the:

- Current Mailing List dated July 11, 2025
- Finance's Late Comments on the Test Claim filed July 21, 2025

California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2022-0018, 22-TC-07 California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2022-018, as modified by Order No. R2-2023-0019; NPDES Permit No. CAS612008; Provisions C.3.b.ii(4), C.3.b.ii(5), C.3.j.ii(1)(a)-(g), C.3.j.ii(4), C.3.j.ii(2)(a)-(j), C.5.f, C.8.d, C.8.e, C.8.f, C.10.a.i, C.10.a.ii, C.10.e, C.11.c, C.12.a, C.12.c, C.15.b.iii, C.17.a, C.20.b, C.21.b, issued May 11, 2022, effective July 1, 2022 Union City, Claimant

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 July 21, 2025 at Sacramento, California.

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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 7/11/25

Claim 22-TC-07 Number:

Matter: California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2022-0018

Claimant: Union City

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.)

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

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

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

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

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

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 Disrict* 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

Allan Burdick,

7525 Myrtle Vista Avenue, Sacramento, CA 95831 Phone: (916) 203-3608 allanburdick@gmail.com

Guy Burdick, Consultant, *MGT Consulting* 2251 Harvard Street, Suite 134, Sacramento, CA 95815 Phone: (916) 833-7775 gburdick@mgtconsulting.com

Shelby Burguan, Budget Manager, *City of Newport Beach* 100 Civic Center Drive, Newport Beach, CA 92660 Phone: (949) 644-3085 sburguan@newportbeachca.gov

Rica Mae Cabigas, Chief Accountant, *Auditor-Controller* Accounting Division, 500 West Temple Street, Los Angeles, CA 90012 Phone: (213) 974-8309 rcabigas@auditor.lacounty.gov

Evelyn Calderon-Yee, Bureau Chief, *State Controller's Office* Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740, Sacramento, CA 95816 Phone: (916) 324-5919 ECalderonYee@sco.ca.gov

Sheri Chapman, General Counsel, *League of California Cities* 1400 K Street, Suite 400, Sacramento, CA 95814 Phone: (916) 658-8267 schapman@calcities.org

Annette Chinn, Cost Recovery Systems, Inc. 705-2 East Bidwell Street, #294, Folsom, CA 95630 Phone: (916) 939-7901 achinners@aol.com

Carolyn Chu, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office* 925 L Street, Suite 1000, Sacramento, CA 95814 Phone: (916) 319-8326 Carolyn.Chu@lao.ca.gov

Michael Coleman, Coleman Advisory Services 2217 Isle Royale Lane, Davis, CA 95616 Phone: (530) 758-3952 coleman@muni1.com

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

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

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

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 Nora Frimann, City Attorney, *City of San Jose* 200 East Santa Clara Street, 16th Floor, San Jose, CA 95113 Phone: (408) 535-1900 nora.frimann@sanjoseca.gov

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

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

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

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

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

Keith Lichten, Division Chief, San Francisco Bay Regional Water Quality Control Board Watershed Management, 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2380 klichten@waterboards.ca.gov

Selina Louie, Water Resource Control Engineer, San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2383 SLouie@waterboards.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

Jennifer Maguire, City Manager, City of San Jose 200 East Santa Clara Street, San Jose, CA 95113 Phone: (408) 535-8111 Jennifer.Maguire@sanjoseca.gov

Joan Malloy, City Manager, Union City Claimant Contact 34009 Alvarado-Niles Road, Union City, CA 94587 Phone: (510) 675-5344 joanm@unioncity.org

Darryl Mar, Manager, *State Controller's Office* 3301 C Street, Suite 740, Sacramento, CA 95816 Phone: (916) 323-0706 DMar@sco.ca.gov

Joseph Martinez, Acting Lead, San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2304 Joseph.Martinez@Waterboards.ca.gov

Tina McKendell, *County of Los Angeles* Auditor-Controller's Office, 500 West Temple Street, Room 603, Los Angeles, CA 90012 Phone: (213) 974-0324 tmckendell@auditor.lacounty.gov

Michelle Mendoza, *MAXIMUS* 17310 Red Hill Avenue, Suite 340, Irvine, CA 95403 Phone: (949) 440-0845 michellemendoza@maximus.com Joseph Monical, Water Resource Control Engineer, San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2304 Joseph.Monical@Waterboards.ca.gov

Jill Moya, Financial Services Director, *City of Oceanside* 300 North Coast Highway, Oceanside, CA 92054 Phone: (760) 435-3887 jmoya@oceansideca.org

Thomas Mumley, Assistant Executive Officer, *San Francisco Bay Regional Water Quality Control Board* 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2395 thomas.mumley@waterboards.ca.gov

Marilyn Munoz, Senior Staff Counsel, *Department of Finance* 915 L Street, Sacramento, CA 95814 Phone: (916) 445-8918 Marilyn.Munoz@dof.ca.gov

Kaleb Neufeld, Assistant Controller, *City of Fresno* 2600 Fresno Street, Fresno, CA 93721 Phone: (559) 621-2489 Kaleb.Neufeld@fresno.gov

Gregory Newmark, Partner, *Duane Morris, LLP* Claimant Representative 865 South Figueroa Street, Suite 3100, Los Angeles, CA 90017-5450 Phone: (213) 689-7434 gnewmark@duanemorris.com

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

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

Johnnie Pina, Legislative Policy Analyst, *League of Cities* 1400 K Street, Suite 400, Sacramento, CA 95814 Phone: (916) 658-8214 jpina@cacities.org

Jai Prasad, County of San Bernardino Office of Auditor-Controller, 222 West Hospitality Lane, 4th Floor, San Bernardino, CA 92415-0018 Phone: (909) 386-8854 jai.prasad@sbcountyatc.gov

Roberta Raper, Director of Finance, *City of West Sacramento* 1110 West Capitol Ave, West Sacramento, CA 95691 Phone: (916) 617-4509 robertar@cityofwestsacramento.org

Teresita Sablan, *State Water Resources Control Board* Santa Ana Regional Water Quality Control Board and San Francisco Bay Regional Water Quality Control Board, 1001 I Street, 22nd Floor, Sacramento, CA 95814 Phone: (916) 341-5174 Teresita.Sablan@waterboards.ca.gov

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

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

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

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

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

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

Mailing List

Eileen White, Executive Officer, San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400, Oakland, CA 94612 Phone: (510) 622-2300 Eileen.White@waterboards.ca.gov

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

Jacqueline Wong-Hernandez, Deputy Executive Director for Legislative Affairs, *California State Association of Counties (CSAC)* 1100 K Street, Sacramento, CA 95814 Phone: (916) 650-8104 jwong-hernandez@counties.org

Elisa Wynne, Staff Director, *Senate Budget & Fiscal Review Committee* California State Senate, State Capitol Room 5019, Sacramento, CA 95814 Phone: (916) 651-4103 elisa.wynne@sen.ca.gov

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

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

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

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