

Thursday, July 3, 2025

Commission on State Mandates  
980 9<sup>th</sup> Street, Suite 300  
Sacramento, CA 95814



**RE: Accessibility to emergency information and services: emergency shelters:  
persons with pets. 24-TC-06**

**LATE FILING**

Dear Chair Stephenshaw and Members of the Commission on State Mandates,

The California State Association of Counties (CSAC) submits this comment letter regarding the test claim submitted by Sacramento County for Chapter 344, Statutes of 2023 (Assembly Bill 781, Maienschein). The primary purpose of CSAC is to represent county government before the California Legislature, California administrative agencies, and the federal government. This includes advocating on the value and need for county programs and services and for adequate funding to provide those services.

CSAC wishes to provide the following comments in response to the comment letter submitted by the California Department of Finance (DOF) on June 6, 2025 regarding 24-TC-06:

**1. DOF Comment:** “Finance notes the requirement to develop emergency plans stems from the discretionary decision of a city or county to form a disaster council.”

- a. **CSAC Response:** This is not correct. The requirement to develop emergency plans does not stem from a local agency’s decision to form a disaster council. Rather, counties, as political subdivisions of the state, are required to take action to carry out the provisions of the State Emergency Plan. California Government Code requires the Governor to coordinate and enforce the State Emergency Plan by coordinating the preparation of plans for mitigation of the effects of an emergency by the political subdivisions of the state. The Governor’s Office of Emergency Services (Cal OES) is the delegated authority by the Governor to implement the State Emergency Plan and perform executive functions assigned by the Governor to support all phases of emergency management. This includes the promulgation of guidelines and assignments to state government and its

political subdivisions to support the development of California's emergency management system. As such, the State's emergency management system designates local governments—such as counties—as primarily responsible for emergency preparedness and response.

While it is discretionary that local emergency plans be developed and approved by a local disaster council, it is not discretionary for local governments to have and maintain emergency plans. The establishment of a local disaster council is one manner in which local governments take action to comply with the requirement to carry out the provisions of the State Emergency Plan. Lacking the establishment of a local disaster council does not exempt a local government from compliance with the State Emergency Act or the directives of Cal OES. The provisions of AB 781 do not specify that they pertain only to emergency plans as developed and approved by local disaster councils. Rather, AB 781 applies to any city or county emergency plan that serves to carry out the provisions of the State Emergency Plan.

The California Emergency Services Act:

- i. "The State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of **each political subdivision shall take such action as may be necessary to carry out the provisions thereof.**" (California Government Code Section [8568](#))
- ii. " "Political subdivision" includes any city, city and county, county, district, or other local governmental agency or public agency authorized by law." (California Government Code Section [8557\(b\)](#))
- iii. " "Emergency plans" means those official and approved documents which describe the principles and methods to be applied in carrying out emergency operations or rendering mutual aid during emergencies. These plans include such elements as continuity of government, the emergency services of governmental agencies, mobilization of resources, mutual aid, and public information." (California Government Code Section [8560\(a\)](#))

- iv. "The Governor shall coordinate the State Emergency Plan and those programs necessary for the mitigation of the effects of an emergency in this state; and **he shall coordinate the preparation of plans and programs for the mitigation of the effects of an emergency by the political subdivisions of this state**, such plans and programs to be integrated into and coordinated with the State Emergency Plan and the plans and programs of the federal government and of other states to the fullest possible extent." (Government Code Section [8569](#)).
- v. "A county shall send a copy of its emergency plan to the Office of Emergency Services on or before March 1, 2022, and upon any update to the plan after that date." (Government Code Section [8593.3.2](#))
- vi. "On or before July 31, 2015, the Office of Emergency Services shall update the State Emergency Plan to include proposed best practices for local governments and nongovernmental entities to use to mobilize and evacuate people with disabilities and others with access and functional needs during an emergency or natural disaster." (Government Code Section [8570.3](#))

**2. DOF Comment:** "Finance further notes it is not aware of any statutory requirement for a local government to operate an emergency shelter, except for requirements that are downstream from the discretionary decision to create a disaster council."

- a. **CSAC Response:** As established above, counties, as political subdivisions of the state, are required to take action to carry out the provisions of the State Emergency Plan. Compliance with the State Emergency Plan includes myriad requirements for accessibility to emergency information and services for the functional needs population pursuant to Government Code Article 6.5 ([Sections 8593 to 8594.16](#)). This includes a requirement for counties, upon the next update to their emergency plans, to integrate functional needs into their emergency planning by addressing how the functional needs population is served by emergency sheltering (Government Code Section [8593.3](#)). It is from this requirement that counties are mandated to integrate many components of accessibility into their emergency plans, as follows:

- i. "A county, including a city and county, shall, upon the next update to its emergency plan, integrate access and functional needs into its emergency plan by addressing, at a minimum, how the access and functional needs population is being served by the following...Emergency sheltering," (Government Code Section [8593.3](#))
- ii. "Upon the next update of a city or county's emergency plan: A county shall update its emergency plan to designate emergency shelters able to accommodate persons with pets." (Government Code Section [8593.10\(b\)\(1\)](#) and [8593.10\(b\)\(1\)\(A\)](#))
- iii. "A county, including a city and county, shall, upon the next update to its emergency plan, integrate cultural competence into its emergency plan by addressing, at a minimum, how culturally diverse communities within its jurisdiction are served by the following...Emergency evacuation and sheltering." (Government Code Section [8593.3.5\(a\)](#) and [8593.3.5\(a\)\(2\)](#)).

CSAC urges the Commission to recognize that local emergency planning, local maintenance of emergency plans, and local compliance with the State Emergency Plan are not discretionary in nature. We encourage the Commission to evaluate test claim 24-TC-06 with the establishment that counties, as political subdivisions of the state, are required to carry out the State Emergency Plan, including accessibility and functional requirements pursuant to Government Code Article 6.5.

Thank you for your consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jacqueline Wong-Hernandez". The signature is fluid and cursive, with a large loop at the end.

Jacqueline Wong-Hernandez  
Chief Policy Officer

## **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 3, 2025, I served the:

- **Current Mailing List dated May 7, 2025**
- **Claimant's Rebuttal Comments filed July 3, 2025**
- **CSAC's Late Comments on the Test Claim filed July 3, 2025**

*Emergency Shelters: Persons with Pets, 24-TC-06*

Statutes 2023, Chapter 344, Section 2 (AB 781); Government Code Section 8593.10(b), (c), and (d), effective January 1, 2024

County of Sacramento, 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 3, 2025 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:** 5/7/25

**Claim Number:** 24-TC-06

**Matter:** Emergency Shelters: Persons with Pets, 24-TC-06

**Claimant:** County of Sacramento

#### 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.)

**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**, *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

**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

**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

**Annette Chinn,** *Cost Recovery Systems, Inc.*

705-2 East Bidwell Street, #294, Folsom, CA 95630

Phone: (916) 939-7901

achinnrcs@aol.com

**Carolyn Chu,** Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*

925 L Street, Suite 1000, Sacramento, CA 95814

Phone: (916) 319-8326

Carolyn.Chu@lao.ca.gov

**Adam Cripps,** Interim Finance Manager, *Town of Apple Valley*

14955 Dale Evans Parkway, Apple Valley, CA 92307

Phone: (760) 240-7000

acripps@applevalley.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

**Executive Director,** *California Animal Response Emergency Support (CARES)*

CDFA Animal Health and Food Safety Services, Animal Health Branch, 1220 N Street, Sacramento, CA 95814

Phone: (916) 900-5002

CDFA.AHB\_Cares\_Program@cdfa.ca.gov

**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

**Tim Flanagan**, Office Coordinator, *Solano County*  
Register of Voters, 678 Texas Street, Suite 2600, Fairfield, CA 94533  
Phone: (707) 784-3359  
Elections@solanocounty.com

**Amber Garcia Rossow**, Legislative Analyst, *California State Association of Counties*  
1100 K Street, Suite 101, Sacramento, CA 95814  
Phone: (916) 650-8170  
arossow@counties.org

**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

**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

**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@smcgov.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

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

**Marilyn Munoz**, Senior Staff Counsel, *Department of Finance*  
915 L Street, Sacramento, CA 95814

Phone: (916) 445-8918

Marilyn.Munoz@dof.ca.gov

**David Neill**, Chief Counsel, *Office of Emergency Services*

3650 Schriever Ave, Mather, CA 95655

Phone: (916) 845-8510

David.Neill@caloes.ca.gov

**Andy Nichols**, *Nichols Consulting*

1857 44th Street, Sacramento, CA 95819

Phone: (916) 455-3939

andy@nichols-consulting.com

**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

**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

**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

**Chad Rinde**, Director of Finance, *County of Sacramento*

**Claimant Representative/Claimant Contact**

700 H Street, Room 3650, Sacramento, CA 95814

Phone: (916) 874-7248

RindeC@SacCounty.gov

**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

cindysconcegc@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

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

**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

**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 Pleasanton*  
3333 Busch Road, Pleasanton, CA 94566  
Phone: (925) 931-5506  
syelong@cityofpleasantonca.gov

**Helmholt 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