



QUARTERLY INVESTMENTS  
REPORT

PREPARED FOR THE SECOND QUARTER  
ENDING AUGUST 31, 2022

# **DEL PUERTO WATER DISTRICT**

## **Statement of Compliance of Investment Policy As of the Second Quarter Ended August 31, 2022**

The Del Puerto Water District is operating in compliance with the investment policy adopted by the Board of Directors. The District believes the market valuation represents the District's best available information and fairly represents the value of the portfolio.

The District's goal is to enhance its economic status while protecting its funds. The District is continuously analyzing and fine-tuning the investment mix. With safety of the portfolio the top priority, a diverse mix is maintained. Management invests with the intent and capacity to hold all securities to maturity. The portfolio is managed to ensure that scheduled cash needs, as well as extraordinary cash needs are met. Adequate liquidity is maintained to ensure un-foreseen cash requirements. Investments and deposits are made in such a way as to maximize return consistent with safe and prudent treasury management.

## **Statement of the Ability of the Del Puerto Water District To Meet Six Month Cash Demands**

The Treasurer of Del Puerto Water District attempts to maintain adequate liquid funds to meet ordinary and extraordinary cash needs at all times. The Treasurer reports that absent any extraordinary circumstances, there exists adequate reserves and cash on hand to sufficiently meet normal budgetary requirements for the next six months.

**DEL PUERTO WATER DISTRICT**  
**Quarterly Report of Investments**  
**Summary for the Second Quarter Ending August 31, 2022**

<b>Bank Accounts:</b>	<u>Bal @ 05/31/22</u>		<u>Bal @ 08/31/22</u>	
Oak Valley Community Bank, Patterson				
Checking/General Fund	\$55,636.63		\$192,511.53	
Checking/CC Rev Fund	\$0.00		\$407,823.51	
Checking/SWP Program	\$29,056.05		\$81,785.76	
Checking/RWSP-NVRRWP Program	\$5,092.52		\$5,524.64	
Checking/RWSP-CNRA Program	\$5,529.34		\$6,063.75	
Savings/General Fund	\$1,203,889.96		\$84,195.96	
Petty Cash/Housebank	\$300.00		\$300.00	
Total Cash Funds	<u>\$1,299,504.50</u>	2.2%	<u>\$778,205.15</u>	1.4%
<b>Other Investments:</b>				
Granite Wealth Mgmt for LPL Financial, Modesto, California*				
Money Market	\$7,766,111.90	13.2%	\$1,054,055.25	1.9%
Certificate of Deposit	\$16,684,907.14	28.4%	\$14,132,084.77	24.8%
Local/Municipal/Corporate Bonds	\$29,860,012.20	50.8%	\$29,562,501.15	51.9%
Government Securities	<u>\$2,050,604.80</u>	3.5%	<u>\$10,305,730.04</u>	18.1%
Total Estimated Portfolio Value at LPL Financial	<u>\$56,361,636.04</u>		<u>\$55,054,371.21</u>	
Oak Valley Community Bank - SWPP CD	\$102,786.01	0.2%	\$102,915.63	0.2%
Oak Valley Community Bank - NVRRWP CD	\$1,000,206.86	1.7%	\$1,000,332.91	1.8%
<b>Total Funds Liquid and Invested</b>	<u><b>\$58,764,133.41</b></u>	100.0%	<u><b>\$56,935,824.90</b></u>	100.0%

\* See following Detailed Quarterly Report of LPL Financial Investments

**Del Puerto Water District**  
Detailed Quarterly Report for Investments Held at LPL Financial  
as of August 31, 2022

**Detail of Portfolio:**

			<b>Market Value</b>
			<b>8/31/2022</b>
<b>Certificate of Deposit - Rate Stabilization Fund</b>			
	#3156-9782		
Third Fedl S&L Assn OH CD	3.1000%	Sep-22	\$250,027.50
Barclays Bank DE CD	2.3000%	Oct-22	\$250,059.25
Weighted Average Earnings	2.7000%		\$500,086.75
<b>Certificate of Deposit - RWSP/NVRRWP Fund</b>			
	#2988-1894		
Fall River Five Cents SB Fall River MA CD	2.1500%	Nov-22	\$247,937.50
Enerbank USA UT CD	0.1000%	Dec-22	\$248,120.75
Luana Svgs Bank Luana IA CD	1.6000%	Jan-23	\$249,103.75
Marlin Business Bank Salt Lake City UT CD	1.6500%	Jan-23	\$249,179.50
Merrick Bank South Jordan UT CD	1.7000%	Jan-23	\$249,220.00
Unity Bank Clinton NJ CD	1.6500%	Jan-23	\$249,120.75
TCM Bank NA FL CD	0.1500%	Jan-23	\$247,129.75
Signature Bank NA Toledo OH CD	2.8500%	Feb-23	\$250,251.75
Industrial&Coml BK China NY CD	2.6500%	Feb-23	\$100,004.90
Northstar Bank MI CD	1.0500%	Apr-23	\$247,348.00
West Michigan Cmnty Bank MI CD	1.0500%	Apr-23	\$247,348.00
Sallie Mae Bank UT CD	1.4000%	Apr-23	\$228,010.27
Goldman Sachs Bank USA NY CD	2.9500%	Apr-23	\$250,227.50
Ann Arbor State Bank CD*	2.7500%	Apr-23	\$249,940.25
BMW Bank of North America CD	3.0000%	Apr-23	\$250,302.75
Capital One NA VA CD	1.3500%	Apr-23	\$148,606.80
Commerce Bank MN CD	1.0500%	Apr-23	\$247,157.00
First Natl Bank TX CD	0.5500%	May-23	\$245,829.00
Peoples Bank of GA CD	0.3000%	Jun-23	\$244,899.25
BMO Harris Bank NA IL CD	0.6000%	Jun-23	\$108,056.11
Discover Bank DE CD	3.3000%	Jun-23	\$100,314.30
Hingham Instn for Svgs MA CD	0.2000%	Jun-23	\$244,522.50
Prospect Bank IL CD	0.3000%	Jun-23	\$244,899.25
Bankwell Bank CT CD	0.4000%	Jul-23	\$244,308.75
Texas Exchange Bank SSB TX CD	0.7000%	Jun-24	\$237,937.25
Stockman Bank of MT CD	0.5000%	Jun-24	\$238,166.75
Morton Cmnty Bank IL CD	0.5000%	Jun-24	\$237,989.25
Kennett Trust Bank MO CD	0.4500%	Jun-24	\$236,539.25
Continental Bank UT CD	0.5000%	Jun-24	\$237,828.25
Bank Princeton NJ CD	0.5000%	Jun-24	\$237,797.50
Southern Bancorp Bank AR CD	0.5000%	Oct-24	\$235,320.75
Nebraskaland Natl Bank NE CD	1.2000%	Apr-25	\$236,027.50
Center State Bank FL CD	1.0000%	Apr-25	\$234,614.50
State Bank of India NY CD	1.0500%	Jun-25	\$234,210.25
Independence Bank of KY CD	0.6000%	Jun-25	\$231,159.25
Peoples Exchange Bank AL CD	0.6000%	Jun-25	\$231,100.25
Caldwell B&T Co LA CD	0.5500%	Jun-25	\$230,515.25
High Plains Bank CO CD	0.5000%	Jun-25	\$230,201.50
Partners Bank Helena AR CD	0.6000%	Jun-25	\$230,874.75
Discover Bank DE CD	2.1500%	May-26	\$138,198.05
Weighted Average Earnings	1.1163%		\$9,050,318.68
<b>Certificate of Deposit - RWSP/CNRA Fund</b>			
	#2350-9015		
Allegiance Bank Houston TX CD	2.1500%	Sep-22	\$248,027.77
Wells Fargo Natl Bk West NV CD	1.9000%	Jan-23	\$49,861.60
Bankunited NA FL CD	0.1500%	Feb-23	\$246,630.25
Haddon Svgs Bank NJ CD	0.1000%	Apr-23	\$245,831.75
First Natl Bank ME CD	2.8000%	May-23	\$244,973.29
KS Statebank KS CD	2.3000%	May-23	\$244,083.21
Comenity Capital Bank UT CD	3.2500%	Jun-23	\$248,721.68
RCB Bank OK CD	3.1500%	Jun-23	\$245,519.64
First Carolina Bank NC CD	0.3500%	Jun-23	\$244,864.00
WEX Bank UT CD	0.2500%	Jun-23	\$243,604.17
Bankers Bank of KS CD	0.2000%	Jul-23	\$243,059.75
Transn Alliance Bank Inc UT CD	0.2500%	Jul-23	\$243,935.50
Cmnty West Bank NA CA CD	0.2000%	Aug-23	\$243,568.00
Citibank NA SD CD	3.4000%	Jan-24	\$230,757.16
Wells Fargo Bank NA SD CD	3.2000%	Jan-24	\$200,193.40

**Del Puerto Water District**  
 Detailed Quarterly Report for Investments Held at LPL Financial  
 as of August 31, 2022

GE Capital Retail Bank UT CD	3.3000%	Mar-24	\$210,278.67
Bank of New England CD	2.6000%	May-24	\$247,359.00
Capital One Bank USA VA CD	2.6500%	May-24	\$247,418.50
State Bank of India IL CD	0.5000%	Jan-26	\$226,200.00
Toyota Finl Svgs Bank NV CD	0.9300%	Jul-26	\$226,792.00
Weighted Average Earnings	1.6522%		\$4,581,679.34
			<b>Total CD Investments \$14,132,084.77</b>

**Local/Municipal/Corporate Bonds -RWSP/NVRRWP Fund**

#2988-1894

SLDMWA CA Rfdg DHCCP Rev B/E Txbl	0.6200%	Mar-23	\$191,811.75
Port Oakland Rev Rfdg B/E Txbl	0.8210%	May-23	\$205,361.10
University CA Rev Gen B/E Txbl	2.7500%	May-23	\$198,282.00
Orange CA Pension Oblig Rev B/E Txbl	0.3910%	Jun-23	\$237,179.60
Desert CA Cmnty Clg Dist Rfdg B/E Txbl	0.4580%	Aug-23	\$96,748.00
Liberty CA Un High Sch Dist Rfdg B/E Txbl	0.4090%	Aug-23	\$140,580.40
State Center CA Cmnty Clg Dist Rfdg B/E Txbl	0.6000%	Aug-23	\$150,294.20
West Contra Costa Uni Sch Dist Rev Rfdg B/E Txbl	0.2760%	Aug-23	\$482,570.00
California St Dept Veteran Affairs Rev B/E Txbl	0.3840%	Dec-23	\$477,870.00
Santa Paula CA Util Auth Wstwr Rev B/E Txbl	1.0580%	Feb-24	\$95,930.00
San Jose CA Arpt Rfdg Rev B/E Txbl	0.6500%	Mar-24	\$236,775.00
Bay Area Toll Auth Rev Txbl B/E	2.2540%	Apr-24	\$737,287.50
Gardena CA Pension Oblig. Rev. B/E	1.5020%	Apr-24	\$479,970.00
Beverly Hills CA Pub Fin Auth Rev Rfdg B/E Txbl	0.7300%	Jun-24	\$188,912.00
San Francisco Cmnty Clg Dist Ser A1 B/E Txbl	0.8160%	Jun-24	\$274,934.50
Coachella CA Pension Oblig. Rev. B/E	1.3840%	Jul-24	\$99,357.30
Fremont CA Uni Sch Dist Alameda Cty Rfdg B/E T	0.4740%	Aug-24	\$240,090.15
Fresno CA Uni Sch Dist Rfdg B/E Txbl	0.7190%	Aug-24	\$329,343.00
San Joaquin Delta Cmnty Clg Dist B/E Txbl	0.5850%	Aug-24	\$470,040.00
Santa Clarita Clg Dist B/E Txbl	2.1020%	Aug-24	\$115,923.60
Santa Rosa CA Regl Res Auth Rev Txbl Fixed	2.7500%	Aug-24	\$122,233.75
Sonoma Cnty Jr Clg Dist Rfdg B/E Txbl	2.0610%	Aug-24	\$111,323.45
Yosemite CA Cmnty Clg Dist Rfdg B/E Txbl	0.8040%	Aug-24	\$89,357.00
Rancho Santiago CA Cmnty Clg Dist Rfdg B/E Txl	0.6340%	Sep-24	\$113,080.80
Sacramento CA Wstwr Rfdg Rev B/E Txbl	0.9580%	Sep-24	\$136,475.45
San Jose CA LIBR Rfdg Rev B/E Txbl	2.3000%	Sep-24	\$218,643.75
California St Univ Rev Syswide Ser B B/E Txbl	3.4060%	Nov-24	\$193,915.80
California St Univ Rev Syswide Ser B B/E Txbl	3.2720%	Nov-24	\$49,510.00
El Dorado CA Irr Dist Rev Rfdg B/E Txbl	3.2440%	Jan-25	\$342,653.50
Gardena CA Pension Oblig. Rev. B/E	1.7020%	Apr-25	\$399,742.25
Santa Clara Vly CA Rev Rfdg B/E Txbl	0.7920%	Apr-25	\$343,965.00
University CA Genl Rev B/E Txbl	0.8830%	May-25	\$160,585.25
Chabot Las Positas Cmnty Clg Dist Rfdg B/E Txbl	0.8800%	Aug-25	\$188,218.70
Citrus CA Cmnty Clg Dist Rfdg B/E Txbl	0.8190%	Aug-25	\$367,192.00
Mt San Antonio Cmnty Clg Dist Rfdg B/E Txbl	2.0400%	Aug-25	\$233,644.25
Napa Vly Ca Uni Sch Dist Rfdg B/E Txbl	0.8940%	Aug-25	\$229,520.00
San Benito High Sch Dist Rfdg B/E Txbl	1.0030%	Aug-25	\$197,797.85
San Jose Evergreen CA Cmnty Clg Dist Rfdg B/E T	0.9210%	Sep-25	\$456,895.00
California St Univ Rev Syswide Ser B B/E Txbl	0.8620%	Nov-25	\$452,575.00
California St Dept Res Cent Vly Rev B/E Txbl	0.7900%	Dec-25	\$347,273.85
California St Various Purp B/E Txbl	2.6500%	Apr-26	\$217,098.00
El Segundo CA Pension Oblig Rev B/E Txbl	1.2320%	Jul-26	\$221,770.00
San Joaquin Delta Cmnty Clg Dist Rfdg B/E Txbl	1.1330%	Aug-26	\$112,586.25
Weighted Average Earnings	1.2292%		\$10,755,317.00

**Local/Municipal/Corporate Bonds -RWSP/CNRA Fund**

#2350-9015

San Francisco CA CPUC Wir Rev Txbl	2.6190%	Nov-22	\$174,770.75
California ST DWRCV Rev Txbl	0.3490%	Dec-22	\$396,344.00
SLDMWA CA Rfdg DHCCP Rev B/E Txbl	0.6200%	Mar-23	\$186,893.50
PEPSICO Inc SR Note	0.7500%	May-23	\$490,567.50
Port Oakland CA Rev B/E Txbl	0.8210%	May-23	\$132,017.85
University CA Rev Gen B/E Txbl	2.7500%	May-23	\$198,282.00
Orange CA Pension Oblig Rev B/E Txbl	0.3910%	Jun-23	\$242,020.00
Tustin CA Uni Sch Dist Rfdg B/E Txbl 0.257%	0.2570%	Aug-23	\$294,877.05
Folsom Sch Dist Rfdg B/E Txbl	3.0000%	Oct-23	\$316,796.80
Sacramento Cnty Santn Dist Rev B/E Txbl	0.7590%	Dec-23	\$308,249.60
Santa Paula CA Util Auth Wstwr Rev B/E Txbl	1.0580%	Feb-24	\$95,930.00
Bay Area Toll Auth Rev Txbl B/E	2.2540%	Apr-24	\$737,287.50
El Cajon Pension Oblig. Rev. B/E	0.9270%	Apr-24	\$236,390.00

**Del Puerto Water District**  
 Detailed Quarterly Report for Investments Held at LPL Financial  
 as of August 31, 2022

Gardena CA Pension Oblig. Rev. B/E	1.5020%	Apr-24	\$479,970.00
Toyota Motor Credit Corp Note	2.9000%	Apr-24	\$493,841.50
University CA Rev Gen BE Txbl	2.4390%	May-24	\$97,471.00
University CA Rev Gen BE Txbl	2.9000%	May-24	\$294,633.00
Beverly Hills CA Pub Fin Auth Rev Rfdg B/E Txbl	0.7300%	Jun-24	\$188,912.00
San Francisco Cmnty Cllg Dist Ser A1 B/E Txbl	0.8160%	Jun-24	\$279,674.75
Coachella CA Pension Oblig. Rev. B/E	1.3840%	Jul-24	\$99,357.30
Sequoia CA Un High Sch Rfdg B/E Txbl	1.6650%	Jul-24	\$239,955.00
Southern CA Pub Pwr Auth Rev Txbl	0.7330%	Jul-24	\$265,365.70
Southern CA Pub Pwr Auth Rev Txbl	0.7330%	Jul-24	\$169,884.00
Castro Valley CA Uni Sch Rfdg B/E Txbl	0.7000%	Aug-24	\$471,655.00
Fontana CA Uni Sch Dist Rfdg B/E Txbl	0.8400%	Aug-24	\$493,153.50
Fresno CA Uni Sch Dist Rfdg B/E Txbl	0.7190%	Aug-24	\$329,343.00
Ohlone CA Cmnty Cllg Rfdg B/E Txbl	1.8140%	Aug-24	\$467,564.25
Ontario CA Wtr Rfdg B/E Txbl	0.9780%	Aug-24	\$377,712.00
San Juan CA Uni Sch Rfdg B/E Txbl	0.7020%	Aug-24	\$470,705.00
Sonoma Cnty Ca Jr Cllg Dist Rfdg B/E Txbl	2.0610%	Aug-24	\$111,323.45
Yosemite CA Cmnty Cllg Dist Rfdg B/E Txbl	0.8040%	Aug-24	\$89,357.00
Bank of New York SR Note	3.2500%	Aug-24	\$247,946.75
Rancho Santiago CA Cmnty Cllg Dist Rfdg B/E Txbl	0.6340%	Sep-24	\$471,170.00
Suisun Solano CA Wtr Auth Rev Rfdg B/E Txbl	0.6700%	Sep-24	\$261,094.40
California St Univ Rev Syswide Ser B B/E Txbl	3.2720%	Nov-24	\$49,510.00
Chevron USA GTD Note	3.9000%	Nov-24	\$251,490.00
El Dorado CA Irr Dist Rev Rfdg B/E Txbl	3.2440%	Jan-25	\$342,653.50
San Francisco CA Mun Transn Rfdg B/E Txbl	0.6540%	Mar-25	\$228,777.50
California St Rev Txbl B/E	3.3750%	Apr-25	\$507,048.40
California St Various Purp B/E Txbl	2.6500%	Apr-25	\$303,937.20
Gardena CA Pension Oblig. Rev. B/E	1.7020%	Apr-25	\$399,742.25
San Diego Cnty Regl Transn Rev B/E Txbl	2.0850%	Apr-25	\$468,454.70
Apple Inc Note	1.1250%	May-25	\$466,451.50
U S Bancorp Medium Term Note	1.4500%	May-25	\$470,237.50
University CA Rev Gen BE Txbl	0.8830%	May-25	\$458,815.00
Pfizer Inc Note	0.8000%	May-25	\$463,041.50
California Infra & Econ Rev B/E Txbl	1.2750%	Jul-25	\$230,735.00
Mt San Antonio Cmnty Cllg Dist Rfdg B/E Txbl	2.0400%	Aug-25	\$228,876.00
Napa Vly CA Uni Sch Dist Rfdg B/E Txbl	0.8940%	Aug-25	\$229,520.00
Ventura Cmnty Cllg Dist Rfdg B/E Txbl	1.9910%	Aug-25	\$190,488.00
Cucamonga Vly CA Wtr Water Rev Rfdg A B/E Tx	0.9900%	Sep-25	\$367,960.00
Johnson & Johnson Note	0.5500%	Sep-25	\$458,144.00
San Mateo Un High Sch Dist Rfdg B/E Txbl	2.3160%	Sep-25	\$258,417.00
Modesto CA Wstwr Rev Rfdg B/E Txbl	0.9850%	Nov-25	\$168,679.30
Caterpillar Finl Svcs Note	0.8000%	Nov-25	\$452,696.50
Bank America Corp Sr Note	0.6500%	Dec-25	\$436,058.50
West Stanislaus CA Rev Rfdg B/E Txbl	1.2800%	Jan-26	\$455,575.00
SLDMWA Rev OM&R B/E	1.2600%	Mar-26	\$215,882.40
El Segundo CA Pension Oblig Rev B/E Txbl	1.2320%	Jul-26	\$221,770.00
Cucamonga Vly CA Wtr Water Rev Rfdg A B/E Tx	3.5500%	Sep-26	\$271,708.25
Weighted Average Earnings	1.4714%		\$18,807,184.15
<b>Government Securities - General Fund</b>	<b>#7469-5488</b>	<b>Total Municipal Bond Investments</b>	<b>\$29,562,501.15</b>
US Treasury Bill	1.9820%	Sep-22	\$2,004,712.02
US Treasury Bill	2.5200%	Nov-22	\$2,003,728.09
Weighted Average Earnings	2.2509%		\$4,008,440.11
<b>Government Securities - Rate Stabilization Fund</b>	<b>#3156-9782</b>		
US Treasury Bill	2.2490%	Nov-22	\$349,778.88
US Treasury Bill	2.7840%	Jan-23	\$1,503,181.20
Weighted Average Earnings	2.6830%		\$1,852,960.08
<b>Government Securities - RWSP/NVRRWP Fund</b>	<b>#2988-1894</b>		
Fedl Home Loan Mtg Corp Note	0.5000%	Jun-24	\$474,555.50
US Treasury Note	3.0000%	Jun-24	\$297,515.40
US Treasury Note	3.0000%	Jul-24	\$743,788.50
Fedl Farm Credit Bank MN Bond	0.6800%	Jun-25	\$462,142.50
US Treasury Note	3.0000%	Jul-25	\$246,835.75
Weighted Average Earnings	1.9848%		\$2,224,837.65
<b>Government Securities - RWSP/CNRA Fund</b>	<b>#2350-9015</b>		
US Treasury Note	2.7500%	Jul-23	\$497,031.00
US Treasury Note	2.8750%	Nov-23	\$397,187.20
US Treasury Note	3.0000%	Jul-25	\$246,835.75
Fedl Home Loan Bank Bond Step	0.4000%	Feb-26	\$853,674.75
Fedl Home Loan Bank Bond Step	0.5500%	Jul-26	\$224,763.50
Weighted Average Earnings	1.6735%		\$2,219,492.20
<b>Total All Non-Money Market Investments-Without RWSP/NVRRWP &amp; RWSP/CNRA</b>	<b>0.2122%</b>	<b>Total Gov't Sec. Investments</b>	<b>\$10,305,730.04</b>
<b>Total All Non-Money Market Investments</b>	<b>1.2351%</b>		<b>\$6,361,486.94</b>
<b>Insured Cash Account - General Fund</b>	<b>0.200%</b>		<b>\$54,000,315.96</b>
			<b>\$12,675.35</b>

171

**Del Puerto Water District**  
**Detailed Quarterly Report for Investments Held at LPL Financial**  
as of August 31, 2022

Money Mkt Funds - General Fund	0.260%	\$0.00
Insured Cash Account - Rate Stab. Fund	0.200%	\$812,922.60
Money Mkt Funds - Rate Stab. Fund	0.260%	\$0.00
Insured Cash Account - CVP Capital Fund	0.100%	\$2,714.00
Money Mkt Funds - CVP Capital Fund	0.260%	\$0.00
Insured Cash Account - RWSP/NVRRWP Fund	0.300%	\$13,805.30
Money Mkt Funds - RWSP/NVRRWP Fund	0.260%	\$0.00
Insured Cash Account - RWSP/CNRA Fund	0.300%	\$41,914.00
Money Mkt Funds - RWSP/CNRA Fund	0.260%	\$0.00
Insured Cash Account - CC Reserve Fund	0.120%	\$170,024.00
Money Mkt Funds - CC Reserve Fund	0.260%	\$0.00
		\$1,054,055.25
 <b>Total LPL Investments</b>	 <b>1.2148%</b>	 <b>\$55,054,371.21</b>

Total Estimated Value is the approximate value of the assets held at LPL Investments & outside companies at the date shown on the attached statement copies. It is estimated as the prices used to value your securities are provided by an outside service and do not always represent the exact market price. LPL Financial does not guarantee the accuracy of such values.

Values for many fixed-income securities are estimates based on coupon rate and credit rating and may not represent the actual transaction price. Values do not include accrued interest or dividends and for some investments do not reflect applicable charges and fees.





September 9, 2022

Via email: [LSJR-SD-Comments@waterboards.ca.gov](mailto:LSJR-SD-Comments@waterboards.ca.gov)

Division of Water Rights Mail Room  
Attn: San Joaquin Unit  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

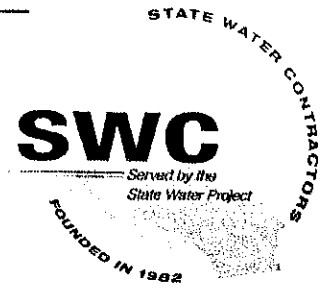
Re: Comment Letter- 2018 Bay Delta Plan Implementation NOP

Dear Mr. Carr:

The State Water Contractors (SWC) appreciate this opportunity to comment on the CEQA Notice of Preparation (NOP) for the implementation regulation for the 2018 update (Phase 1) to the Water Quality Control Plan (Bay-Delta Plan).

The SWC is concerned that the State Water Resources Control Board (Water Board) has decided to implement Phase 1 primarily through a regulation rather than through an adjudicative water rights process. The NOP notice is framed in terms of "an adoption of a regulation." However, the program of implementation for Phase 1 at p. 22 describes a broader approach:

The State Water Board will exercise its quasi-legislative or adjudicative power involving water rights and water quality to require implementation of water quality objectives. Water quality actions include water quality certifications, regulations, waste discharge requirements, and water quality permitting. In the future, the State Water Board may amend this program of implementation, take action in a water right proceeding or proceedings to change the water right responsibilities of water right holders to implement these objectives or take other actions that implement the objectives.



**DIRECTORS**

**Craig Wallace**  
President  
Kern County Water Agency

**Robert Cheng**  
Vice President  
Coachella Valley Water  
District

**Laura Hidas**  
Secretary-Treasurer  
Alameda County Water  
District

**Stephen Arakawa**  
Metropolitan Water District  
of Southern California

**Thomas Pate**  
Solano County Water  
Agency

**Ray Stokes**  
Central Coast Water  
Authority

**Matthew Stone**  
Santa Clarita Valley Water  
Agency

**Peter Thompson, Jr.**  
Palmdale Water District

**Jacob Westra**  
Tulare Lake Basin Water  
Storage District

**General Manager**  
Jennifer Pierre

17

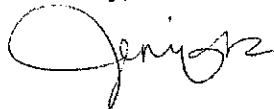
Mr. Carr  
September 9, 2022  
Page 2

If the adoption of a regulation is just one part of the Water Board's multi-faceted implementation plan, it would be helpful if the Water Board explained the totality of the proposed implementation approach as part of the description of the project. As written, the NOP lacks sufficient detail to inform commenters as to the scope of the analysis, lacking any description of the regulatory alternatives under consideration or any broad implementation approach, making it impossible for the SWC to provide specific comments as to the potential environmental impacts or to suggest any alternatives. Once a complete project description describing the implementation approach and how the responsibility will be allocated across the water right holders for the flow and salinity objectives, the Water Board should provide sufficient notice for public input. The SWC would appreciate an opportunity to engage with the Water Board on this issue to better understand what is being proposed.

We are also concerned that the stated regulatory approach lacks transparency, and we question the Board's authority to allocate responsibility to water users and to modify water rights without the due process afforded by a water rights hearing. We would appreciate clarification from the Water Board regarding its specific plan for implementing a regulatory approach, how it fits within the broader approach and the range of alternatives that may be evaluated. As such, we request the Water Board to share the assessment of the regulatory approach showing whether it would offer the equivalent due process afforded by a water rights hearing.

The SWC looks forward to working with the Water Board. Please contact us at any time to discuss these comments.

Sincerely,



Jennifer Pierre  
General Manager